

Heuristic Management, Corporation Privacy Notice

Effective Date: January 1, 2021

This Privacy Notice applies to Personal Information processed by Heuristic Management, Corporation in the course of our business, including, <https://www.eurekainfund.com>, the Heuristic Management, Corporation Applications (each a "Site") and the services provided through the Sites (collectively with the Sites, the "Services").

The terms "**Heuristic Management, Corporation**," "**we**," "**us**," and "**our**" includes Heuristic Management, Corporation and our affiliates and subsidiaries.

Please note that unless we define a term in this Privacy Notice, capitalized terms used in this Privacy Notice have the same meanings as in our [Terms of Use](#).

This Privacy Notice contains the following sections:

1. Personal Information Collection and Use
2. Personal Information Sharing
3. Your Choices
4. Individual Rights in Personal Information
5. Personal Information Retention
6. Personal Information Storage and Security
7. Other Important Information

1. Personal Information Collection and Use

This Privacy Notice covers our use of Personal Information. "**Personal Information**," means any information that relates to you and can -- either on its own or in combination with other information -- identify you as an individual. Personal information does not include information that has been de-identified or aggregated such that you can no longer be identified.

The types of information we collect depends on your level of engagement with the Services. The more you interact with the Services, the more information we need to provide the Services. This Section explains how we collect and use personal information based on your level of engagement with the Services.

A. All Users of the Heuristic Management, Corporation Sites

From registered and unregistered users of the Sites, we automatically receive and record information whenever you interact with the Sites. This includes IP address data from our server logs, cookie information, browser information, information about your activity while on the Sites (such as the pages you request, properties that you view or save, and property that you claim),

and the URL of the site you came to the Sites from. We also may collect the mobile device ID (such as the ID for Advertising on iOS and Android ID on Android) from users of the Heuristic Management, Corporation Applications. If permitted by the settings on your device and/or with your consent, we will also collect your geo-location information. We use this to provide you with location specific information, such as homes for sale near your current location as determined by your geolocation, and information about listing your home for sale based on your geolocation. We may also approximate your location based off your IP address, to customize your experience on our Sites.

We may also use the information listed above to help diagnose problems and performance with the Services, analyze trends, customize your experience, and administer the Services. We may provide IP addresses to third-parties to help us analyze website user survey data. We may also use the information described in this section to better target information about Heuristic Management, Corporation's Sites and Services, for example, by displaying more accurate or relevant information on our Sites, matching you to a public record listing of a property, tailoring the advertising we display on third party websites and platforms, and sending better targeted and tailored messages, including via email and/or push notifications.

B. Registered Users of the Heuristic Management, Corporation Sites

We are required to collect certain information, including your name and email address, as a condition of our licenses with the multiple real estate listing services (the "MLSs") in order to allow you to access the full MLS listings. You give us this information when you create your Heuristic Management, Corporation account. When you give us this information at one of our events, or upon your request, we will create a Heuristic Management, Corporation account for you, and you agree that this Privacy Notice and our [Terms of Use](#) apply. In addition, when you are signed in to your Heuristic Management, Corporation account and using Heuristic Management, Corporation through Facebook, Twitter, or any other third-party authorization service, we may make use of the information that they provide us to further customize your Heuristic Management, Corporation experience. We may share Personal Information with such third parties to deliver Heuristic Management, Corporation tailored content both on our Services and on third party sites (e.g., social media sites).

- **My Heuristic Management, Corporation:** My Heuristic Management, Corporation is a feature that allows you to upload notes and photos about a property, save searches, add favorites and x-outs, and otherwise organize homes that may interest you. We save all of this "My Heuristic Management, Corporation" information for use later in connection with our Services. It is stored with your Heuristic Management, Corporation account information.
- **Account Password Security:** Your Heuristic Management, Corporation account password is encrypted on our server. It is your responsibility not to disclose your password to other people and to ensure you maintain its security.
- **Account Updates:** By visiting your [My Heuristic Management, Corporation: Account Settings](#), you can correct, amend, add or delete Personal Information associated with your account. However, even after you update information, we may maintain a copy of the original information in our records as required by applicable law or other legal obligation.

C. Heuristic Management, Corporation Clients

When you are getting ready to buy or sell a home and you start working with our coordinators and agents, you become a Heuristic Management, Corporation client. As part of the home purchase or sale process, you will need to provide a lot of information as is customary for a home purchase or sale transaction. This information can include, without limitation, your name, address, phone number, email address, financial or payment information, including without limitation, buyer loan pre-approval documentation and seller property information. We ask you, as a buyer, for loan pre-approvals from a mortgage broker or lender to determine which homes are in your price range and to help you make an offer more quickly when you do find a home. You, as a seller, may be legally required to disclose certain information about your property to prospective buyers. Once you sign a listing agreement or buyer agreement with us, your relationship with Heuristic Management, Corporation is governed by that agreement, as well as our online [Terms of Use](#) and this Privacy Notice.

D. Communications with Heuristic Management, Corporation

Heuristic Management, Corporation may collect Personal Information from you such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter, request customer or technical support, or otherwise communicate with us.

E. Marketing

We may send marketing materials to Heuristic Management, Corporation account holders and clients using various communication channels, including without limitation, email, text messages/SMS, push notifications, telephone calls, and direct mail. Individuals may also subscribe to Listing Alert Emails or other notifications with information such as customized summaries of homes for sale. Heuristic Management, Corporation may send you Heuristic Management, Corporation-related news and surveys in accordance with applicable law.

F. Call Recording

We may record any telephone calls between you and our agents or other representatives for training and quality assurance purposes.

G. Surveys

Heuristic Management, Corporation may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information, which may include Personal Information.

H. Sharing with Friends or Colleagues

Heuristic Management, Corporation's Services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Email

addresses that you may provide for a friend or colleague will be used to send your friend or colleague the content or link you request in accordance with applicable law.

I. Interactive Features

Heuristic Management, Corporation may offer interactive features such as chat services, forums, and social media pages. We may collect the information you submit or make available through these features. Any content you provide on the public sections of these channels will be considered "public" and will not be subject to the privacy protections referenced herein.

J. De-Identified and Aggregated Information

We may use Personal Information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, de-identified or aggregated trends, reports, or statistics, information about the computer or device from which you access our Services, or other analyses we create. De-identified and aggregated information is used for a variety of functions, including the measurement of visitors' interest in and use of various portions or features of the Sites and Services. De-identified and aggregated information is not Personal Information, and we may use and disclose such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purpose.

K. Conferences and Trade Shows

We may attend or participate in conferences and trade shows where we collect Personal Information from individuals who interact with or express an interest in Heuristic Management, Corporation and/or the Services. If you provide us with any information at one of these events, we will use it for the purposes for which it was collected.

L. Information We Collect Automatically

We may collect certain information automatically when you use the Services. This information may include your Internet protocol (IP) address, user settings, IMEI, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, details about your browser, operating system or device, location information, Internet service provider, pages that you visit before, during and after using the Services, information about the links you click, and other information about how you use the Services. Information we collect may be associated with accounts and other devices.

M. Cookies and Pixel Tags/Web Beacons

We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, local storage, and other technologies ("Technologies") to automatically collect information through the Services. Technologies are essentially small data files placed on your computer, tablet, mobile phone, or other devices that allow us to record certain pieces of information whenever you visit or interact with our Sites and Services.

- **Cookies.** Cookies are small text files placed in visitors' device browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Sites that collects information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.

You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits.

N. Information from Other Sources

We may obtain information about you from other sources, including through third-party services and organizations to supplement information provided by you. This supplemental information allows us to verify information that you have provided to us and to enhance our ability to provide you with the Services.

O. Other Uses of Information

In addition to the specific collection and uses listed above, we may use any of the Personal Information we collect for the following business purposes:

- to operate our Sites and provide our Services in accordance with our [Terms of Use](#) and/or any other agreement you may have with us;
- to manage your Personal Information and accounts;
- to respond to your questions or inquiries;
- to conduct promotional activities, including contests or surveys;
- to undertake internal research for technological development and demonstration;
- to improve, upgrade or enhance our Sites and Services;
- to send you informational or promotional communications;
- to detect bugs, security incidents (including to protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity);
- to identify and repair errors that impair existing intended functionality;
- to undertake activities to verify or maintain the quality or safety of a Service, Site or transaction;
- to carry out other purposes that are disclosed to you and/or to which you consent; and
- to pursue our legitimate interests where your rights and freedoms do not outweigh these interests.

2. Personal Information Sharing

While we do not exchange your Personal Information with others for monetary or other valuable consideration, we may share your Personal Information with the following categories of third parties as part of our Services to you or to assist us in conducting our marketing and advertising, or for other business or commercial purposes listed above in this Privacy Notice.

A. Public Record Information

Please be aware that home sales and purchases may be a matter of public record, and your name and address, the price you paid, your property taxes, and other information may be available from public sites regardless of the brokerage(s), if any, who assist in the transaction. We post on our Sites some information that typically becomes part of the public record of a home sale or purchase.

B. Non-Public Record Information

We share information obtained from you, MLSs and other third-party sources that is not on the public record to facilitate your home purchase or sale transaction. This includes:

- **Service Providers to all Heuristic Management, Corporation Clients:** Our agents work with third parties to process your home search and sale transaction and must share your information with those third parties. Examples include MLSs and providers of software used for document preparation and electronic signing.
- **Partner Agents:** A Partner Agent is employed by or works with another brokerage and is not a representative or employee of Heuristic Management, Corporation. Partner Agents have contracted with us to provide Heuristic Management, Corporation-quality service to a wider range of customers. We'll refer you to a Partner Agent in our discretion. If you are referred to a Partner Agent for your home purchase or sale transaction, we share your information with that Partner Agent so they can assist you. Heuristic Management, Corporation is not responsible for the work performed or the services provided by Partner Agents in any manner.
- **Home Seller Service Providers:** As is customary as your home sales agent, we share your listing information with MLSs and other listing websites, such as Realtor.com, Trulia.com and Zillow.com. As a result, your listing may appear on more than one website. We may also share your listing and contact information with listing vendors such as photographers, home staging experts and home repair professionals like plumbers and electricians, as needed.
- **Home Buyer Service Providers:** As is customary as your home purchase agent, we must share your buying information with inspectors, title companies, escrow agents, closing attorneys, lenders, and other third parties as needed to process your transaction.
- **Potential Buyers:** By law, we are required to disclose certain information about your property to potential buyers.

C. Negotiations

We also post price offers and counteroffers on our Sites. We do not post your name on our Sites without your permission, but if the sale is closed, the price and the fact that you bought or sold your house at that price may be a matter of public record.

D. Heuristic Management, Corporation Corporate Family

We may share your information with members of the Heuristic Management, Corporation family of entities for various purposes, including to: (i) provide the Services to you; (ii) help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; (iii) help with marketing initiatives; and (iii) manage and improve Heuristic Management, Corporation products, Sites, Services and tools.

E. Service Providers

We may share your Personal Information with third-party service providers that assist us in providing the Services. We use reasonable efforts do so with the appropriate contractual protection in place to ensure that your Personal Information is protected and used only in accordance with this Privacy Notice.

F. Business Partners

We may provide Personal Information to business partners to provide you with a product or service you have requested. We may also provide Personal Information to business partners with whom we jointly offer products or services in accordance with applicable law.

G. Third-Party Cookies and Information Used to Target Ads to You

We may share the information that we collect about you with others (including advertising networks and service providers) to tailor and serve you ads on our Services, as well as other websites and social media networks. This practice is commonly referred to as "interest-based advertising" or "online behavioral advertising." These advertising networks track your online activities over time by collecting information through automated means, including through the use of Technologies (e.g., cookies, web-beacons and other methods). This allows Heuristic Management, Corporation to target our advertising to you through demographic, behavioral and contextual means. As a result, you may see ads for Heuristic Management, Corporation on other websites and social media.

H. APIs and SDKs

We may use third party APIs and software development kits ("SDKs") as part of the functionality of our Services. APIs and SDKs may allow third parties, including advertising partners, to collect your Personal Information to provide our Service related content that is more relevant to you. For more information about our use of APIs and SDKs, please contact us as set forth below.

I. Information Disclosed in Connection with Business Transactions

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your

information may be sold or transferred as part of such a transaction as permitted by law and/or contract.

J. Information Disclosed for Our Protection and the Protection of Others

We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to respond to claims or legal processes (including subpoenas); (ii) to protect our property, rights and safety and the property, rights and safety of a third party or the public in general; and (iii) to stop any activity that we consider illegal, unethical or legally actionable.

K. Other Purposes

Heuristic Management, Corporation may share your Personal Information for other purposes that are clearly disclosed to you at the time you provide Personal Information or with your consent.

3. Your Choices

A. General

You may have the right to opt in, object to or opt out of certain uses of your Personal Information. Where you have consented to the processing of your Personal Information, you may withdraw that consent at any time by contacting us as described below. Even if you opt out, we may still collect and use Personal Information regarding your activities on our Sites, Services and/or information from the advertisements on third party websites for other legal purposes as described above in accordance with applicable law.

B. Electronic Messages, Phone Calls and other Communications

If you receive an unwanted email from Heuristic Management, Corporation, you can visit the Email Preferences section of your [My Heuristic Management, Corporation: Alerts & Emails](#) or use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding the Services or updates to our Terms of Use or this Privacy Notice).

C. Opting-Out of Technologies and Tracking

- **Heuristic Management, Corporation Cookies:** We put Heuristic Management, Corporation cookies on your device's browser to help us keep track of when you were last on the Sites, and what you last searched on the Sites. While you are free to disable cookies on your browser, we recommend that you leave cookies activated to use some of the most useful Heuristic Management, Corporation features.

- **Third-Party Cookies for Analytics:** We may use third parties, such as comScore and Google, to help us analyze how people are using the Services, and those third parties are authorized to use Technologies to access Personal Information regarding visitors to the Sites.
- **Google Analytics:** We use the Google Analytics service to provide us with demographic data about our users on a de-identified basis. This Google service uses a cookie that can be recognized by Google or its affiliate DoubleClick when you visit other websites. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google Analytics' collection and use of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.
- **Opting Out of Heuristic Management, Corporation's Interest-Based Advertising:** If you do not want Heuristic Management, Corporation to collect, use and share information about you to deliver interest-based advertising, please [click here](#) and follow the opt-out instructions. Please note that most opt-out mechanisms are cookie-based and will only affect the specific computer and browser that is used to submit an opt-out request. If you have multiple computers or change computers, or use multiple browsers, you will need to submit opt-out requests for each such computer or browser. In addition, if you delete, block or otherwise restrict cookies, you will need to renew the opt-out choices to ensure that any opt-out cookies remain effective.
- **Opting Out of Interest-Based Advertising Generally:** The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at www.networkadvertising.org/managing/opt_out.asp, <http://www.youronlinechoices.eu/>, <https://youradchoices.ca/choices/>, and www.aboutads.info/choices/. To separately make choices for mobile apps on a mobile device, you can download DAA's AppChoices application from your device's app store. Please note you must separately opt out in each browser and on each device.
- **Opting Out of Mobile Device ID Tracking:** Mobile device users may opt-out of receiving some interest-based advertising in their mobile apps by following the instructions for [Android](#) and [iOS](#). Please note that precise instructions may vary by device.
- **Do Not Track:** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Flash Cookies:** Heuristic Management, Corporation does not currently use flash cookies, but we may in the future. To control flash cookies, [click here](#). Please note that flash cookies do not reside in your browser, so your browser settings will not affect them.

D. Mobile Devices

We may send you push notifications through the Heuristic Management, Corporation mobile application. You may at any time opt-out from receiving these types of communications by changing the settings on your mobile device. Heuristic Management, Corporation may also collect location-based information if you use our mobile applications. You may opt-in or opt-out of this collection by changing the settings on your mobile device.

E. Delete your Account

You may delete your Heuristic Management, Corporation account on your [My Heuristic Management, Corporation: Account Settings](#) page under "Close Account" section. We retain Personal Information for as long as we have a valid business purpose to or to meet our legal obligations. Heuristic Management, Corporation may be required to keep a copy of your Personal Information in accordance with Section 5 below.

4. Individual Rights in Personal Information

In accordance with applicable law, you may have the right to: (i) request confirmation of whether we are processing your Personal Information; (ii) obtain access to or a copy of your Personal Information; (iii) receive an electronic copy of Personal Information that you have provided to us, or ask us to send that information to another company (the "right of data portability"); (iv) restrict our uses of your Personal Information; (v) seek correction or amendment of inaccurate, untrue, incomplete, or improperly processed Personal Information; and (vi) request erasure of Personal Information held about you by Heuristic Management, Corporation, subject to certain exceptions prescribed by law. If you would like to exercise any of these rights, please contact us as set forth below.

We will process such requests in accordance with applicable laws. To protect your privacy, Heuristic Management, Corporation may take steps to verify your identity before fulfilling your request.

5. Personal Information Retention

Heuristic Management, Corporation retains the information we receive as described in this Privacy Notice for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

6. Personal Information Storage and Security

Heuristic Management, Corporation is headquartered in the United States. You agree that we may store and process the information we collect anywhere in the world, including but not limited to, the United States, the European Union, or other countries.

We take steps to ensure that your information is treated securely and in accordance with this Privacy Notice. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure.

By using the Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Services, by mail or by sending an e-mail to you.

7. Other Important Information

A. California Privacy Notice Provisions

The follow provisions supplement the information contained in our privacy Notice above and applies solely to individuals, who reside in the State of California ("consumer" or "you") in our role as a business. We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended ("CCPA") and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

In providing our Services, we may collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("Personal Information").

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We have collected the following categories of Personal Information from our consumers in our role as a business within the last twelve (12) months (as indicated with a Yes below):

Category	Examples	Collected
Identifiers.	Name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security, or other similar identifiers.	No
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No

Category	Examples	Collected
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No
Biometric information.	Physiological, biological, or behavioral, characteristics (including DNA) that can be used to establish individual identity, or imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template such as a faceprint, a minutiae template, or a voiceprint, can be extracted and keystroke patterns or rhythms, gait patterns, or rhythms, and sleep, health or exercise data that contain identifying information.	No
Internet or other electronic network activity.	Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.	No
Geolocation data.	Physical location or movements.	No
Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
Professional or employment-related information.	Current or past job history or performance evaluations.	No
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
Inferences drawn from other personal information to create a profile about a consumer.	Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No
Personal information categories listed in the categories above, but references in the California Customer Records statute (Cal.	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card	No

Category	Examples	Collected
Civ. Code § 1798.80(e)).	number, or any other financial information, medical information, or health insurance information. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories.	

Categories of Sources from Which Personal Information is Collected

We obtain the categories of Personal Information listed above from the types and categories of sources described above in this Privacy Notice.

Business or Commercial Purposes for Collecting Personal Information

We may use, or disclose the Personal Information we collect for the business purposes describe above in this Privacy Notice. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you additional notice.

Disclosures of Personal Information for a Business Purpose

We may disclose your Personal Information to the third parties or others as described above in this Privacy Notice, for any of the business purposes described above in this Privacy Notice. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information in our role as a business for a business purpose:

- Identifiers
- Commercial information
- Internet information

Sales of Personal Information

In the preceding twelve (12) months, we have not sold any Personal Information in our role as a business as defined in the CCPA or other applicable laws.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your request, we will disclose to you:

- The specific pieces of Personal Information we collected about you
- The categories of Personal Information we collected about you.
- The categories of sources from which the Personal Information is collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- If we sold or disclosed your Personal Information for a business purpose

Right to Delete

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may not be able to honor your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the rights of other consumers to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the business' deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your Right to Know and Right to Delete

To exercise the access and deletion rights described above, please submit your request to us at info@eurekainvfund.com, or contact us in writing at the address listed below in this Privacy Notice. Only you or an authorized agent registered with the California Secretary of State that you authorize to act on your behalf, may make a consumer request related to your Personal Information. You may also make a consumer request on behalf of your minor child (12 and under). If you have any questions about your access or deletion rights described above, you may also contact us via email or regular mail at the contact information contained below in this Privacy Notice.

You may only make a Right to Know request twice within a 12-month period.

We cannot respond to your request to delete or provide you with Personal Information if we cannot verify your identity or your authority to make the request and confirm the Personal Information relates to you.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

Where possible, we will respond to a verified consumer request within forty-five (45) days of its receipt; however, if we require more time, we will inform you of the reason and extension period.

Any disclosures we provide will only cover the 12-month period preceding the verified consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

We do not disclose your Personal Information to any third-party in a manner that would be considered a sale under the CCPA.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer, will reasonably relate to your Personal Information's value to us and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Sites and Services who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please contact us using the contact information provided below in this Privacy Notice.

B. Children

Our Sites and Services are not directed to children under 13 (or other age as defined by local law), and we do not knowingly collect Personal Information from children. If you learn that your child has provided us with Personal Information without your consent, you may contact us at the email address below with the subject line "COPPA Child Information Request." If we learn that we have collected any Personal Information from a child in violation of applicable law, we will promptly take steps to delete such information.

C. Supervisory Authority

If you are located in the European Economic Area, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your Personal Information violates applicable law.

D. Links to Third Party Sites/Applications

The Services may contain links to other websites/applications and other websites/applications may reference or link to our Sites or other Services. These other websites and applications are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. Heuristic Management, Corporation does not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

E. Changes to this Privacy Notice

Heuristic Management, Corporation may revise this Privacy Notice from time to time in our sole discretion. If there are any material changes to this Privacy Notice, we will notify you as required

by applicable law, which may include updating our notice on our Sites. You understand that you will be deemed to have accepted the updated Privacy Notice if you continue to use the Services after the new Privacy Notice takes effect.

F. Contact Us

If you have any questions about our privacy practices or this Privacy Notice, please contact us at:

Attn:
Legal Department
Eureka Investment Fund
3595 Balboa Street
San Francisco, CA 94121