

## **PRIVACY POLICY**

APPS P, Inc.  
Delaware corporation  
Effective date: [Date]  
Last updated: [Date]

### **INTRODUCTION**

APPS P, Inc. places particular importance on the protection of the personal data of users of its digital platforms.

This Privacy Policy is intended to inform users about how their personal data is collected, used, and protected when you visit our website, use our web platform and mobile application.

The Company is a corporation duly incorporated under the laws of the State of Delaware, in the United States, and is committed to processing personal data in accordance with applicable laws.

If you do not accept the terms of this Privacy Policy, please do not access or use the Platform.

### **NATURE OF THE PLATFORM**

The Platform is a technology platform for real estate matchmaking with integrated services that allows:

Property owners ("Listers") to upload, film, and publish real estate listings free of charge.

Interested buyers or professional users ("Seekers") can access basic information for free and pay \$10 USD (convertible to local currency) for in-depth virtual access.

Direct B2B transactions between Listers and Seekers, without company involvement.

Integrated geolocation and mapping services to access properties.

Smart notification systems.

The company is neither a real estate broker, agent, nor intermediary and does not participate in transactions between users.

### **INFORMATION COLLECTED**

In connection with the use of the application and website, the Company may collect the following categories of information:

## **A. Personally Identifiable Information:**

- Full name
- Email address
- Phone number
- Mailing address
- Housing preference data (budget, area, property type)

## **B. Account Information**

- Username
- Password (encrypted)
- Profile details

## **C. Payment Information**

Payments are processed by third-party providers compliant with PCI-DSS standards (Payment Card Industry Data Security Standard).

APPS P does not retain full bank card numbers and does not directly collect banking data, but does so through the payment gateways it uses.

We may collect:

- Payment confirmation
- Transaction history
- Billing address

## **D. Real Estate Listing Content**

- Photos
- Videos
- Property descriptions
- Address and GPS coordinates
- Price details

## **E. Geolocation Data**

- Precise GPS position (with consent)
- Device location data
- Route history (if enabled)

You may disable location services in your device settings.

## **F. Technical Data (collected automatically)**

- Device identifier
- Operating system
- Browser type
- Log files
- Access times
- Browsing data

## **G. Usage Data**

This data informs us about interactions with the application by measuring the frequency, duration of sessions, and actions to understand user behavior and engagement.

## **PURPOSE OF PROCESSING**

The data collected is used to:

- Provide and maintain the platform
- Process payments
- Enable direct communication between users
- Facilitate the use of geolocation and mapping features
- Send smart notifications
- Improve the user experience
- Detect fraud and enhance security
- Comply with our legal obligations
- Enforce our Terms of Use
- Conduct analysis and improve our products
- Send marketing communications (where permitted by law)

## **LEGAL BASIS FOR PROCESSING**

The processing of personal data collected by APPS P, Inc. is carried out on the following grounds:

- Performance of a contract
- Legitimate interests of APPS P, Inc.
- Compliance with legal obligations
- User consent

If you reside in the European Union, the processing of your data may be carried out in accordance with the General Data Protection Regulation (GDPR).

## **SHARING OF INFORMATION**

The data collected may be shared with:

- Payment service providers
- Cloud hosting providers
- Analytics providers
- Mapping and geolocation service providers (e.g., Google)
- Notification service providers
- Competent authorities, where applicable
- Our business partners in the context of business operations

We do not sell your personal information to third parties, unless otherwise stated.

## **COOKIES AND TRACKING TECHNOLOGIES**

We use:

- Essential cookies, which are small computer files indispensable to the technical operation of our website. They store users' login information.

- Analytical or performance cookies, which are small files stored in the browser for the purpose of collecting anonymous user data about their browsing. They are used to monitor and analyze how users interact with the APPS P, Inc. platforms.
- Functional cookies designed to improve the user experience by remembering preferences and settings that make our platforms more user-friendly. While not necessary for the proper functioning of our platforms like essential cookies, they provide a more personalized experience.
- Mobile SDK tracking technologies, which are a set of codes integrated into our application, designed to collect user data such as location, behavior, and identifiers through the phone's sensors. These technologies enable the use of third-party services.

It is important to note that under the California CCPA data protection regulations, the use of cookies is subject essentially to user consent.

You can manage your cookie preferences through your browser settings.

## **DATA RETENTION**

Collected data is retained:

- As long as your account is active
- In accordance with legal or tax requirements: a VPS hosting provider from the American company GreenGeeks is responsible for data retention.
- For fraud prevention purposes
- In accordance with our internal retention policies
- Inactive accounts may be deleted after 2 or 3 years in accordance with the GDPR.

## **DATA SECURITY**

We implement appropriate technical and organizational measures, including:

- Secure authentication
- Internal role-based access controls
- Security monitoring
- Incident response procedures. However, no system is 100% secure.

## **INTERNATIONAL TRANSFERS**

Data may be stored and processed in the United States.

In the event of international transfers of personal data, we implement appropriate safeguards, such as standard contractual clauses where required.

## **SERVICE ACCESS LIMITATIONS**

APPS P, Inc. is unable to provide services to residents of the following countries:

- IR Iran
- KP North Korea
- CU Cuba

- SY Syria
- CN China
- RU Russia
- BY Belarus
- MM Myanmar (Burma)
- AF Afghanistan
- ER Eritrea
- CF Central African Republic
- DE Democratic Republic of the Congo
- LR Liberia
- IQ Iraq
- LB Lebanon
- LY Libya
- SO Somalia
- SD Sudan
- VE Venezuela
- ZW Zimbabwe

## **USER RIGHTS**

In accordance with the various American and international regulations on the protection of personal data, users have the following rights:

- The right of access to their data
- The right to rectification in case of error on any of the information provided
- The right to object to the processing of their data if the purpose of the initial processing changes
- The right to be forgotten, allowing them to request the deletion of their data from the Platform at any time

## **PROTECTION OF CHILDREN'S PRIVACY**

Under the American COPPA law (Children's Online Privacy Protection Act), access to the platform is prohibited to any child under the age of 13.

## **USER AND THIRD-PARTY LIABILITY**

Users are responsible for the information they share through the platform. Listers are responsible for processing the data they receive in the context of the matchmaking.

## **POLICY MODIFICATIONS**

APPS P, Inc. reserves the right to modify this privacy policy at any time. Any changes will be published on the relevant media.