

PLEASE READ THIS PRIVACY NOTICE CAREFULLY BEFORE USING THIS WEBSITE.

HEC Market, LLC. (“HEC”, “we”, “us”, and “our”) understands that confidentiality of information is important to visitors to our website and to our customers. We firmly believe that it is important for you to be informed regarding what information we collect, how we protect and use it, and what options are available to you with regard to information sharing.

This Online Privacy Notice (the “Privacy Notice”) describes the types of information we may collect from you — as well as our practices for using, protecting, and disclosing that information — when you use our website, (the “Site”). This Privacy Notice applies to information we collect on the Site and in email, text, and other electronic messages between you and us. By using or accessing this Site, you agree to this Privacy Notice.

We may supplement this Privacy Notice with the following:

- **Specific Terms Agreed to by You.** If you qualify to participate in one or more HEC products or services, we may ask you to enter into one or more other agreements with us. In that event, the terms in those agreements will also govern our collection, use, sharing, and securing of your information.
- **Other Supplemental Notices on the Site.** Additionally, we may supplement this Privacy Notice with other supplemental notices posted on specific web pages within the Site. These supplemental notices describe in more detail the information we collect via particular pages or services on the Site.
- **If you do not consent to this Privacy Notice, please exit and do not use the Site. If you do not consent to any supplemental notice, do not use the pages or services to which it pertains.** If you have any questions, please contact us at [info@homeequitycontracts.com](mailto:info@homeequitycontracts.com), (201) 292-7849 (local), or at the information provided at the bottom of this Privacy Notice.

## 1. WHAT INFORMATION DOES HEC COLLECT?

HEC collects information that identifies you (“Personal Information”) as well as other types of information about your activities on the Site that does not identify you. We describe each of these categories, and how we collect each of these categories, in more detail below.

**Information You Provide to Us.** We collect Personal Information and other information that you knowingly provide to us via the Site or other means of contacting us, or otherwise authorize us to collect, including when you:

- Create an account with us

- Seek a prequalification through the “Get Started” link on the Site •

Submit an application for products or services

- Contact us via any customer service method
- Submit user-generated content
- Subscribe for email or other messages
- Otherwise communicate information to us

The types of Personal Information we collect include name, address, telephone number, email address, information about your household and finances, information to enable us to check and verify your identity, your gender information, information to enable us to undertake credit or other financial checks on you, and information about how you intend to use the services and products we provide.

You will always be prompted to provide any Personal Information we are collecting via the Site, but we may also combine that information with other information (including Personal Information) that we receive from third parties. For example, when you submit a prequalification request, we ask you to complete a form with several types of information, including your name, address, and information about your household, finances, and intended use of our services. To give another example, when you send us a request, we may ask you to identify yourself by name and email address.

**Information Collected Through Technology.** We may also collect information about you automatically when you visit our Site. The information we collect from you in this way is not intended to personally identify you to us, although it may be unique or consist of information you consider personal. This information includes your IP address, the identity of your Internet Service Provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit, the pages you visit, information about referring websites, and any search terms you enter while on the Site. Although we do not use this information by itself to identify you, we may link this information to other Personal Information that you choose to provide to us.

**Browser-based Information Collection.** We use “cookies,” “pixel tags,” “web beacons,” and other Web technologies for a number of purposes, including:

- to collect information about the ways you use the Site — for example, which pages you visit, which links you use, and how long you stay on each page;
- to support the features and functionality of the Site — for example, to save

you the trouble of re-entering information already in our database or to prompt the settings you established on previous visits to the Site; and

- to personalize your experience when you use the Site.

Cookies are small pieces of information stored by your browser on your computer's hard drive. Most web browsers accept cookies by default, but you can change your browser settings to refuse cookies. If you do so, you may experience difficulties using the Site. Pixel tags and web beacons are tiny graphic images used to help us analyze your online shopping patterns, create content designed for your connection speeds, and deliver email in a format you can read.

**Email-based Information Collection.** When you access this Site by clicking on a link in an electronic communication you receive from us or one of our advertisements, your browser tells us that someone has clicked on a particular link in that particular electronic communication or advertisement. We use this information to improve our marketing efforts.

**Information Collected from Server Logs.** In addition, we review our server logs — which contain visitors' IP addresses — for security and fraud-prevention purposes. If we suspect criminal activity, we may share our server logs and the Personal Information we have collected through this Site with the appropriate investigative authorities who could use that information to investigate criminal wrongdoing.

**Third-Party Services.** Some third-party services we use, such as Google Analytics, may use cookies, web beacons, or other similar technologies or information gathering tools to collect or receive information from the Site and elsewhere on the Internet and use that information to provide measurement services or target ads. Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the data collected to track and examine the use of the Site, to prepare reports on its activities, and to share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. Please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) (or any other URL Google may provide from time to time) for information about how Google may use your information and how you may be able to control the information sent to Google.

This Privacy Notice covers only our use of cookies, pixel tags, web beacons, and other similar technology and not the use of such technology by third parties. Similarly, this Privacy Notice does not apply to third-party websites accessed via hyperlinks within the Site.

## 2. HOW DOES HEC USE THE INFORMATION IT COLLECTS?

We use your information in a manner consistent with this Privacy Notice to:

- Process and evaluate your application(s)
- Provide pre-qualification information
- Help us improve our products and services
- Communicate with you and respond to your inquiries
- Maintain and service your HEC account
- Maintain and improve the Site
- Provide customer service
  - Conduct research and analysis, including regarding Site usage trends, purchasing patterns and preferences, and visitor demographics
- Advertise, or enable our partners to advertise, to you
- Fight spam and other abuse
- Comply with legal requirements, industry standards, and our own policies •

Deliver products and services you have requested

- Carry out our obligations and enforce our rights arising from any agreements entered into between you and us
- Notify you about changes to the Site or any products or services we offer or provide through the Site
- As may otherwise be disclosed at the time of collection
- Protect ourselves, our customers, and others from economic or physical harm

For example, we keep track of the pages you visit and the manner in which you use the Site to determine what features or products are most popular and whether to make changes to the Site. To give another example, we may review your information and information of other customers to help us analyze trends, purchasing patterns and preferences, and demographics.

We may also use the information you provide to us to personalize your experience by

using your product interests, browsing patterns, and related information to recommend other products, services, or promotions that we believe may interest you. We may also use the information you provide to notify you of changes to the Site.

We may combine the information you provide to us or that we collect from you with data that is publicly available and data that we collect at our marketing events or receive from other sources.

### **3. HOW DOES HEC SHARE YOUR INFORMATION WITH THIRDPARTIES?**

Information that we collect, which does not identify specific individuals, may be shared with our service providers or other third parties in our discretion and in compliance with applicable law consistent with the uses described in the previous section.

### **4. HOW CAN YOU UNSUBSCRIBE, CHANGE YOUR INFORMATION, OR OPT OUT OF CERTAIN PRACTICES?**

We want to communicate with you only if you want to hear from us. If you prefer not to receive information from us or would like to update or change your contact information or preferences, you can do so using one or more of the following methods:

- If you have a user account with us, you can edit or delete your information by updating your account using the “Login” link on the Site
- You may send your request to us via the points of contact listed at the end of this Privacy Notice
- You may unsubscribe from any marketing emails by clicking on the link in the email

If you contact us for this purpose, please provide your full name, user name, address, and email address so that we can locate your information. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We will respond to your request within a reasonable period of time.

In addition, for data collected using Google Analytics, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) (or any other URL Google may provide from time to time) for information about how you may be able to control the information sent to Google. We cannot guarantee that such third parties or their services will enable you, or will continue to enable you, to control such collection.

### **5. WHAT SECURITY MEASURES DOES HEC USE TO PROTECT YOUR INFORMATION?**

HEC has implemented measures intended to secure your information from accidental loss and from unauthorized access, use, alteration, and disclosure. You also play an important role in maintaining the safety and security of your information. You should ensure that you are familiar and comfortable with the security level of your browser and watch for security alerts affecting the software on your computer or the browser you are using. Where we have given you access credentials, such as a user name and password, you are responsible for keeping these credentials confidential, and we ask you not to share them with anyone. Unfortunately, the transmission of information via the Internet is not completely secure, and no company, including HEC, can fully eliminate security risks. Although we have implemented measures to protect your information, we cannot guarantee the security of your information transmitted to or from us, including via email, or the security of any links accessible from our Site.

## **6. LINKS TO OTHER WEBSITES**

This Site may, from time to time, contain links to websites owned and operated by third parties (“Third-Party Sites”). We encourage you to review the privacy policies of such Third-Party Sites so that you understand how those websites collect, use, and share your information. We are not responsible for the privacy notices, practices, or other content on Third-Party Sites.

## **7. MAKING SURE YOUR INFORMATION IS UPDATED**

You are responsible for making sure that your information is accurate and complete. If any information you have provided changes, please update your information by following the methods provided in Section 4 above.

## **8. CHILDREN**

HEC provides only business services and neither intends to collect nor knowingly collects any information from or about children.

## **9. CALIFORNIA RESIDENTS**

California Civil Code Section 1798.83 permits Site users who are California residents to request and obtain from us a list of what Personal Information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge.

## **10. DO NOT TRACK**

Some web browsers offer a “Do Not Track” setting. However, there is currently no industry standard regarding the meaning of “Do Not Track” and what, if anything,

websites should do in response. As a result, we may not respond to “Do No Track” signals.

## **11. NOTICE TO VISITORS OUTSIDE OF THE UNITED STATES**

This Site is intended for use by residents of the United States of America only. You should be aware that the United States and other countries have not harmonized their privacy regulations. Our Privacy Notice is intended to comply with United States requirements. By using the Site, you agree to the level of privacy protection set out in our Privacy Notice.

## **12. SOCIAL MEDIA**

We may interact with you via a variety of social media platforms, including Facebook, Twitter, and Instagram. If you contact us on one of our social media platforms, request customer service via social media, or otherwise direct us to communicate with you via social media, we may contact you by direct message or use other social media tools to interact with you. In such cases, our communications are governed by this Privacy Notice and the privacy notice of the social media platform you use. In addition, if you choose to communicate with us through a third-party social media platform, you are granting us permission to access and use the information you post or store on the applicable social media platform in accordance with the privacy notice of that platform. We don't control, and are not responsible for, the privacy practices of third-party social media platforms. You should consult the privacy notice of each such platform for additional information.

## **13. CHANGES**

We may change this Privacy Notice or supplemental notices at any time to reflect changes in our policies and practices. You will receive notice of changes by our posting of the amended Privacy Notice or supplemental notice on the Site. By accessing and using the relevant information or services available on the Site following such amendment, you consent to the policies and practices outlined in the Privacy Notice or supplemental notice, as amended.

## **14. CONTACT US**

We welcome your comments and questions. Please contact us at:

Attn: Website Inquiries

HEC Market, LLC.

99 Wall Street #404

New York, NY 10005

[info@homeequitycontracts.com](mailto:info@homeequitycontracts.com)

(201) 292-7849

1. Fee disclosure ("Message and data rates may apply")
2. Service delivery frequency or recurring messages disclosure ("4 messages per month", "Message frequency varies", "1 message per login", etc)
3. Customer care information (typically "Text HELP for help" or Help at (201) 292-7849 - not required for single message programs (i.e 2FA)
4. Opt out instructions (typically "Text STOP to cancel") - not required for single message programs (i.e 2FA)