



## Privacy Policy

PLEASE READ THIS

AGREEMENT CAREFULLY

---

This Privacy Policy (“Policy”) explains how MHT Enterprises LLC, Doing Business As iSpy Home Inspections, (“we,” or “us,” or “our”) collects personal information based on your interactions with us online and offline, including on our websites (including [ispyinspect.com](http://ispyinspect.com)), applications, forums, blogs, and other online offerings (collectively, the “Sites”), when we provide services or offer products online or offline (collectively, the “Services”). This Policy applies to our collection and use of personal information and describes rights you may have with respect to your personal information. By using our Sites and otherwise interacting with us, you agree to the terms of our [Terms of Use](#), including this Policy.

This Policy does not cover the personal information we collect about employees and independent contractors, or job applicants.

### Notice at Collection - Personal Information We Collect

We collect the following categories of personal information:

- **Personal identifiers:** name, email address, mailing address, telephone numbers, address and identifying characteristics and pictures of the property for which service is requested or provided, company affiliations of real estate professionals, customer number, account credentials, and IP address;
- **Commercial and financial information:** records of products or Services ordered or considered; other purchasing or consuming histories; and payment and related transaction information. For franchise applicants, information about your assets, income, property and business ownership interests, and other financial information you provide to us;
- **Internet or other electronic activity information:** your device and browser type, your browsing and search history on our Sites, and information regarding your interaction with our Sites and our advertisements, including the content of email messages, chat sessions, text messages, and telephone calls;
- **Educational information:** education history information provided by franchise applicants;

- **Professional information:** job title, information about your employer and, for franchise applicants, employment and business ownership history and recommendations provided by references;
- **Location or geolocation information:** device location information when using our Sites (if your device settings permit us to collect this information);
- **Audio information:** recordings of customer service calls for quality assurance purposes; and
- **Inferences drawn from personal information we collect:** inferences that may relate to your preferences or other matters.

We have collected the same categories of personal information in the 12 months prior to the date of this Policy.

### **Notice at Collection - Purposes for Collection of Personal Information**

We collect your personal information to provide you with the information you request and our Services. We use the information you provide us to contact you from time to time; to provide you with information about our business; for customer support; to deliver advertisements and marketing promotions and offers about products or Services we think may be of interest to you, including our Services and those of our affiliates; and to analyze the placement and effectiveness of our advertisements and other marketing efforts.

We also use personal information to monitor or improve our Sites; for internal business analysis; to prevent fraud, activities that violate our Terms of Service or that are illegal; and to protect our rights and the rights and safety of our users or others.

For those who interact with us in a commercial capacity, we use your personal information to engage in business transactions with the entity you represent and market to or engage in diligence with the entities you represent.

### **Notice at Collection - Categories of Personal Information We Sell or Share and Related Information**

When we engage in digital advertising, we may sell the following categories of personal information (according to the broad definition of the word “sell” under certain state laws) or we may share them for purposes of cross-context behavioral advertising: personal identifiers (IP address), and internet or other electronic activity information.

These categories of personal information are sold to or shared for cross-context behavioral advertising to advertising networks and other companies that facilitate digital advertising. We engage in such sales and sharing to facilitate digital advertising that is able to reach people that are most likely to be interested in the Services we provide. We do so by allowing third parties to place cookies or other trackers on our Sites that may collect information about your online activities over time and across different websites or applications. These parties may then use the information they collect to provide you with personalized content and present you with third party products or services in which

you may be interested. For more information about the use of cookies and trackers, see the section “Our Use of Cookies and Analytics” below.

We do not sell or share for cross-context behavioral advertising any of the other categories of personal information we collect.

We may sell to our affiliates, most of which are in the home improvement business, personal identifiers, including name, email address, mailing address, and telephone numbers, commercial information, including purchasing and consuming histories, and internet or other electronic activity information so they can offer their products and services to you.

When you allow us to share your personal information with another company, we may sell to marketing and advertising companies and service providers personal identifiers, including name, email address, mailing address, and phone numbers, and commercial information, including purchasing and consuming histories, so they can market, advertise, and offer related products and services to you.

Please note that once we share your personal information with another company in the above circumstances, the information received by the other company is controlled by that company and becomes subject to that company’s privacy practices.

### **Notice at Collection - Retention Periods**

We retain the categories of personal information we collect for the length of time necessary to provide our Service (including any warranty services) and to comply with legal obligations or to protect our legal rights.

### **Categories of Sources From Which We Collect Personal Information**

We collect personal information directly from our customers, website users, and representatives of entities with which we do business or may do business.

We also collect personal information from franchise applicants, franchises, and referrals provided about franchise applicants.

### **Use or Disclosure of Sensitive Personal Information**

We do not use or disclose sensitive personal information to create profiles about individuals or for any purposes other than providing our Services.

### **Disclosure of Personal Information For Business Purposes in the Past 12 Months**

The following chart describes the categories of personal information that we disclosed to third parties for a business purpose in the 12 months prior to the date of this Policy:

<b>Categories of Consumers’ Personal Information</b>	<b>Categories of Third Parties to Which We Disclosed Personal Information for Business Purposes</b>
--	---

<p>Personal identifiers: name, email address, mailing address, telephone numbers, address and identifying characteristics and pictures of the property for which service is requested or provided, company affiliations of real estate professionals, customer number, account credentials, IP address.</p>	<p>Service providers that process payments, verify customer information, manage customer information and provide customer service and other essential information related to that service (including through our call center), facilitate scheduling, facilitate email communications, facilitate SMS/texting communications, process franchisee applications, provide security services and cloud-based data storage, host our Sites and assist with other IT-related functions, advertise and market our products and Services and those of our affiliates, provide analytics information, provide legal and accounting services, and host conferencing services. Subcontractors that perform specialized components of the Services we offer. Marketing and advertising companies and service providers. Franchises.</p>
<p>Commercial information: records of products or Services purchased, ordered, or considered; other purchasing or consuming histories; payment and related transaction information. For franchise applicants, information about applicants' assets, income, property and business ownership interests, and other financial information provided.</p>	<p>Service providers that manage customer information and provide customer service (including through our call center), facilitate scheduling, facilitate email communications, process franchisee applications, provide security services and cloud-based data storage, host our Sites and assist with other IT-related functions, advertise and market our products or Services and those of our affiliates, provide analytics information, and provide legal and accounting services. Marketing and advertising companies and service providers. Franchises.</p>

Internet or other electronic network activity information: device and browser type, browsing and search history on our Sites, and information regarding interaction with our Sites and our advertisements.	Service providers that provide security services and cloud-based data storage, host our Sites and assist with other IT-related functions, advertise and market our products and Services and those of our affiliates, and provide analytics information.
Professional information: job title, information about your employer, franchisee applicants' employment and business ownership history, and recommendations provided by references.	Service providers that manage business contact information and process franchisee applications. Franchises.
Location and geolocation information	Service providers that advertise and market our products and services and those of our affiliates, provide analytics information.
Educational information: education history information provided by franchisee applicants.	Service providers that manage business contact information and process franchisee applications. Franchises.
Audio information: recordings of customer service calls for quality assurance purposes.	Service providers that manage customer information and provide customer service (including through our call center). Franchises.

Disclosure of Personal Information for Business Purposes in the Past 12 Months

For purposes of texting, we do not share your mobile phone number or your consent to SMS/texting with third parties seeking to market to you. For more information, please see **SMS Messaging Terms and Conditions** below.

Business Purposes for Such Disclosures

We disclosed the aforementioned categories of personal information for the following purposes: to provide our Services; manage customer, supplier and vendor accounts and relationships; process payments; verify customers' identities; fulfill orders and transactions; engage in advertising and marketing of our Services and those of our affiliates; provide third party companies and providers the opportunity to market, advertise, and offer related products, operate our IT systems and secure our systems; prevent fraud and other illegal activities; obtain professional advice about legal and accounting matters; evaluate and manage franchise applicants and owners.

## Additional Information About How We May Disclose Personal Information and Purposes for Disclosures

We may also disclose your personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property, or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also disclose your personal information to third parties to help detect and protect against fraud or data security vulnerabilities. And we may disclose or transfer your personal information to a third party in the event of an actual or potential sale, merger, reorganization of our entity or other restructuring.

### **Our Use of Cookies and Analytics**

We and our service providers may use cookies, pixel tags, web beacons and other similar tracking technologies (“tracking technologies”) to automatically collect information through the Services. Tracking technologies are 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. We may use these tracking technologies to help identify irregular behavior, prevent fraudulent activity, and improve security, as well as making it possible for you to save your preferences and help us understand how you interact with our Site.

We also allow third parties to use tracking technologies on our Sites for analytics and advertising. They assist in helping display advertisements, tailor advertisements to your interests and to assist in determining if you require assistance or are having problems navigating on our Sites. Some of these third parties use the tracking technologies to collect information about how you interact with other websites and advertisements across the Internet in order to provide advertising that is tailored to your interests, and which may appear on our Sites or on other websites or platforms.

You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. You can disable cookies from your computer system by following the instructions on your browser or at [www.youradchoices.com](http://www.youradchoices.com).

We use Google Analytics to evaluate the use of our Sites. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit a Site, what pages they visit when they do so, and what other websites they visited prior to visiting our Site. For information about Google’s privacy practices, please refer to the Google Privacy Policy: <https://policies.google.com/privacy?hl=en-US#infocollect>.

### **Personal Information of Minors**

Our products and Services are not directed to minors under the age of 18 and we do not knowingly sell or share for purposes of behavioral advertising the personal information of minors, including minors under 16 years of age.

## **Do Not Track Signals**

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. We observe the Global Privacy Control signal using the Google Tag Manager.

## **SMS Messaging Terms and Conditions**

To receive SMS messaging (texts), you must have a wireless device of your own that is subscribed to 2-way messaging services for your wireless carrier. Carrier traffic may result in delayed or undelivered messages. Test messages to you are at no cost, but your wireless carrier may charge you standard messaging fees or taxes for each message you send or receive, depending on your wireless subscription plan. You expressly consent to receive SMS/texting messages by providing your phone number. You may withdraw that consent at any time.

If you purchase our Services, we or one of our authorized franchisees will provide you with related informational and transactional information by phone, email, or SMS messaging (text). These communications may contain appointment schedules or other reminders related to your use of our Services. You can select your preferred methods of communication for this information.

Your mobile phone number or your consent to SMS/texting will not be shared with third parties seeking to market to you. You may reply STOP at any time to cease marketing texts from us or our authorized franchisees to which you previously consented or click here: [Right To Opt-Out SMS/texting Form](#).

Please note that you cannot opt out of receiving important messages such as appointment information.

For questions or help with any text messages you receive, please reply HELP to the message, email us at [teamispy@ispyinspect.com](mailto:teamispy@ispyinspect.com), or contact us at 703-540-4779.

## **How We Keep Your Personal Information Secure**

We implement and maintain reasonable security appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. However, there is no perfect security, and reasonable security is a process that involves risk management rather than risk elimination. While we are committed to maintaining a reasonable information security program, no such program can be perfect; in other words, all risk cannot reasonably be eliminated. Data security incidents and breaches can occur due to factors that cannot reasonably be prevented. Accordingly, it cannot be assumed that the occurrence of any given incident or breach results from our failure to implement and maintain reasonable security.

## **Changes to This Policy**

This Policy is current as of the Last Updated date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. If changes are made, we will update the Policy on our Sites and reflect the date of such modification in the Last Updated date set forth above.

If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected from you, you will be notified via email or a notice on our Sites.

## Your Choices

Some jurisdictions give you a right to make the following choices regarding your personal information:

- **Right Against Discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your right to know, delete, or opt-out of sales.
- **Right to Know.** You may have the right to request (i) a list of the categories of personal information, such as name, address, email address, that a business has disclosed to third parties during the immediately preceding calendar year for the third parties' direct marketing purposes, and (ii) the names and addresses of all such third parties. In addition, you may have the right to request: (i) the categories of personal information we have collected about you, (ii) the categories of sources from which personal information is collected, (iii) the business or commercial purpose for the information collection, (iv) the categories of third parties with whom we have shared personal information, and (v) the specific pieces of personal information we hold about an individual. In certain limited circumstances, you may also have the right to request to receive access to your data in a portable, machine-readable format.
- **Changes to Your Personal Information.** We rely on you to update and correct your personal information. If our Sites do not permit you to update or correct certain information, you can contact us using the contact information below in order to request that your information be modified. You may ask us to correct information that is inaccurate or incomplete. Note that we may keep historical information in our backup files as permitted by law.
- **Right to Delete.** You may have the right to request us to delete any personal information we have collected from you or maintain about you, subject to certain exceptions where we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another business purpose.
- **Right to Opt-Out.** You may request to opt-out of our ability to share your personal information to third parties for the purposes of targeted advertising. If required by law, we will grant a request to opt-out of such sharing. To submit a request, email us: [teamispy@ispyinspect.com](mailto:teamispy@ispyinspect.com).

To exercise the rights you may have in some jurisdictions described above, contact us using the contact information below. Your request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

## Accessibility



We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at [teamispy@ispyinspect.com](mailto:teamispy@ispyinspect.com) or 703-540-4779.

## **Contact Us**

If there are any questions regarding this Policy or to request a copy of this Policy in another format, you may contact us at 703-540-4779, [teamispy@ispyinspect.com](mailto:teamispy@ispyinspect.com) or 5501 Merchants View Square Suite 701 Haymarket, VA 20169

## **US State Data Privacy Rights**

Laws in certain US states give residents of those states specific rights with respect to the personal information collected about them. See below for more information.