

## Silvernest Privacy Policy

Last updated: June, 2022

We at Silvernest, Inc. respect your concerns about privacy. This Privacy Policy describes the types of personal information we obtain, how we may use the information, with whom we may share it and the choices you may have regarding our use of the information. We also describe the measures we take to safeguard personal information and tell you how to contact us about our privacy practices.

This Privacy Policy applies to the personal information we obtain through our website, [www.silvernest.com](http://www.silvernest.com), and future mobile application (collectively "Site").

### We Recently Updated Our Privacy Policy

We recently updated our privacy policy. These updates include:

- Adding a description of our practices for sharing information with companies in our corporate family, including Finance of America Reverse LLC, and your ability to opt-out of our sharing information with them
- Updating our practices for sharing information with community partners, and your ability to opt-out of our sharing information with them
- Adding a description of our practice to share information when needed to assist in the resolution of disputes between Host and Homeseeker
- Removing references to the Login with Facebook feature and sharing rental listings on Trulia and similar sites, as these practices are no longer used
- Removing references to Users Outside the United States as we only provide services to Hosts and Homeseekers located in the United States

### Information Silvernest Collects

We collect information about you in different ways.

#### Information You Give Us or Information Needed to Use the Site

To use certain services and functionality of the Site (such as to post a property for rent or request to rent such property), you will be required to register for an account with Silvernest. When you register for an account, we will collect certain information from you, some of which is required and some of which is optional. For example, we ask for your name, email address, mailing address, phone number, date of birth, gender, sexual orientation, photos, religious affiliation, username, and password.

If you are a Host posting a property for rent, we will also collect the address of the property, information about the property, and may request photos of the property. If you are a Homeseeker, we ask for your preferred search location and rental term and other optional questions that may be relevant to your request for a roommate or search for a rental, such as your roommate preferences or whether you have pets. In addition, Hosts may customize fields to gather additional information about potential Homeseekers. These customizable fields may ask for health-related information or other information in connection with bartering for rental accommodations.

If you contact us with questions or to request information, we will collect information that you transmit with your communications to us.

You may also post ratings or reviews related to the services we offer or make available through the Site, or your experience with a Host or Homeseeker.

### Information Automatically Collected

We may collect certain information by automated means, such as cookies and web beacons. The information we obtain in this manner includes IP address, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our site, and dates and times of website visits. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon”, also known as an Internet tag, pixel tag or clear GIF, is a tiny graphic image that may be used on our Site. Through these automated collection methods, we obtain “clickstream data,” which is a log of content on which a visitor clicks while browsing a website. As the visitor clicks through the website, a record of the action may be collected and stored. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our Site.

Depending on your device settings, we may also collect information about your precise or approximate location from the IP address you use to access the Site.

### Information Collected from Third Parties

We may partner with organizations in the community to make Silvernest services available. If you engage with a community partner to access Silvernest, we may collect information about you, such as your name and email, when our community partner sends us information or you create an account on our Site through a dedicated community partner landing page.

### Information Collected for Background Check and Identity Verification

If you choose to undergo a background check, we will collect information, such as your name, date of birth, and social security number, to facilitate the background check conducted by a contracted service provider. We will receive summary results of each background check from our service provider and will have access to download your full background check report.

If you choose to complete our identity verification step, we will collect your name, phone number, address and partial social security number to facilitate the identity verification check conducted by a contracted service provider. You may also be asked to provide a copy of your government identification card, such as a driver’s license, as part of the identity verification process. We will receive summary results of each identity verification check from our service provider.

### Information Collected from Corporate Affiliates

We may receive information about you from an affiliated entity in our family of companies, including lenders operating under the Finance of America name. We would receive information as permitted by our affiliate’s privacy policy.

### How Silvernest Uses Information

We use information we maintain about you for different purposes.

#### To Operate the Site and Service

We may use your information for the following purposes:

- to register you to use the Site and manage your account

- to display content on our Site
- to provide our homesharing platform services to you
- to contact you to deliver services or information you requested and respond to your questions
- to verify your authority to use the Site
- to verify your identity
- to enable you to sign you for certain third-party services available through the Site
- to improve the content and general administration of the Site
- to help resolve disputes between users of the Site
- to send you general and personalized marketing and promotions regarding the Site, Silvernest services, and third party or partner services we believe may be of interest to you
- to perform data analyses and other processing (including market and consumer research, trend analysis, financial analysis, anonymization, encryption and tokenization of personal information)
- to operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of our sales, marketing and advertising; analyzing and enhancing our products, services and Site; and performing accounting, auditing, billing, reconciliation and collection activities)
- to protect against, identify and prevent fraud and other criminal activity, claims and other liabilities
- to comply with and enforce applicable legal requirements, relevant industry standards and our policies and terms

If you register to use the Site, you may engage in direct messages with another user through the Site. Silvernest may collect information that you include in such messages and may review such messages from time-to-time for purposes of confirming compliance with Silvernest's [Terms of Use](#) and [Community Guidelines](#) or to detect and/or investigate scams or other types of fraudulent activities.

#### Cookies and Tracking

We use information collected online through cookies, web beacons and other automated means for purposes such as (i) customizing our users' visits to our Site, (ii) delivering content (including advertising) tailored to our users' interests and the manner in which our users browse our Site, and (iii) managing our business. We also use this information to help diagnose technical and service problems, administer our Site, and identify users of our Site. We use clickstream data to determine how much time users spend on web pages of our Site, how users navigate through our Site, and how we may tailor our Site to better meet the needs of our users.

We may use third-party web analytics services on our Site, such as those of Google Analytics. The analytics providers that administer these services use technologies such as cookies, web beacons and web server logs to help us analyze your use of the Site. To learn more about Google Analytics and how to opt out, please visit [google.com/intl/en/analytics/learn/privacy.html](https://google.com/intl/en/analytics/learn/privacy.html) or [support.google.com/analytics/answer/181881?hl=en](https://support.google.com/analytics/answer/181881?hl=en).

Our Site is not designed to respond to "do not track" signals received from browsers.

#### Advertising

We also use third parties (such as Google and Facebook) to serve advertisements that may be of interest to you on other websites. For more information and the ability to control your preferences to receive interest-based online advertising with these third parties, please visit:

- <https://optout.networkadvertising.org/?c=1>
- <http://www.youradchoices.com/>
- <https://policies.google.com/privacy/partners>

We use Facebook Pixels on our Site which tracks user behavior. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected via Facebook Pixel is anonymous to us, meaning that we do not see the personal information of individual users. However, the data collected through the pixel is stored and processed by Facebook. Facebook may link this information to your Facebook account and also use it for its own promotional purposes, in accordance with Facebook's Privacy Policy. Visit [Facebook's Help Center](#) for more information on how you can adjust the ads you see while on Facebook.

We use Facebook Custom Audience that allows us to provide your email to Facebook to target advertisements to you on Facebook. You can change your preferences and opt-out at <https://www.facebook.com/ads/preferences/>.

#### Aggregate Information

Through the third-party analytic providers and directly through our Site, we may track information that will be maintained, used and disclosed in aggregate form. For example, we may collect the total number of visitors to our Site, the number of visitors to each page of our Site, browser type, third-party websites linked to IP addresses. We may analyze this data for trends and statistics in the aggregate, and we may use such aggregate information to administer the Site and gather broad demographic information for aggregate use.

#### When Does Silvernest Share Information

We do not sell or otherwise share your information except as described in this Privacy Policy.

#### Sharing on the Site and With Homeseekers and Hosts

Any information, including your information that you include in a rental property listing (such as address or photos) or ratings or reviews you post will be publicly available on the Site. If you are a Homeseeker, we will transmit your information, including your name, contact information, and username to the Host to enable you to enter into a lease agreement with such Host. If more multiple people are registered as Hosts for a single property, all Hosts associated with the property may receive your information. In addition, a Host or a Homeseeker may request, and you may consent to allow the other to access your background check report. If you are a Host, we will transmit your information, including, your name, contact information and username to the potential Homeseekers who are interested in your rental property.

#### Service Providers

We share your information with third parties who perform services on our behalf. These third parties are not authorized by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

#### Community Partners

We partner with community organizations to make Silvernest services available. You can view a list of our community partners [here](#). You may access Silvernest services through some community partners.

We may share information about you with that partner unless you ask us not to by emailing [hello@silvernest.com](mailto:hello@silvernest.com) or changing your preference [here](#).

#### Third-Party Services

Silvernest may make certain third-party services available on the Site, such as mediation services. Silvernest is not the provider of these third-party services, but Silvernest may provide your name and contact information to such third party. You may be required to agree to terms with the third-party provider or other third-party services.

#### Corporate affiliates

We may share your information with companies in our corporate family of companies, including lenders operating under the Finance of America name, unless you ask us not to by emailing [hello@silvernest.com](mailto:hello@silvernest.com) or changing your preference [here](#).

#### Payment processors

We use Stripe for payment, analytics, and other business services. When providing payment information, you will be directed from our Site directly to Stripe to create a payment account. In addition to your payment credentials, Stripe collects identifying information directly from you about the devices that connect to its services. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection. You can learn more about Stripe and read its privacy policy that controls Stripe's use of your information at [www.stripe.com/privacy](http://www.stripe.com/privacy).

#### When required by law, fraud prevention, and other circumstances

We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) in response to requests by government agencies, such as law enforcement authorities, (iii) for the purpose of or in connection with legal proceedings, or otherwise for the purpose of establishing, exercising or defending our legal rights, or (iv) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

We may also share information with an appropriate third-party or law enforcement if needed to assist in the resolution of a dispute between a Host and Homeseeker. When appropriate or possible, we will require a subpoena or other appropriate legal request before sharing your information.

#### Business transfer or merger

We may transfer your information to a successor entity upon a merger, consolidation or other corporate reorganization in which Silvernest participates or to a purchaser or acquirer of all or substantially all of Silvernest's assets to which this Site relates.

#### With Your Consent

In circumstances other than those described above, we will provide specific notice or ask for your affirmative consent, as required by law, before we share your personal information.

#### Links to Third Party Sites

Our Site may contain links to other websites for your convenience and information. These websites may be operated by companies not affiliated with Silvernest. Linked websites typically have their own privacy policies or notices, which we strongly suggest you review if you visit any linked websites. We are not

responsible for the content of any websites that are not affiliated with Silvernest, any use of those websites, or the privacy practices of those websites.

#### Social Media Plugins on Our Site and App

We may use social plugins on our Site and may include icons that allow you to interact with third party social networks such as Twitter and Facebook. For example, you may include your social media profile in your listing and you may “like” us on Facebook or follow us on Twitter. The third-party social plugin may set a cookie when your browser creates a connection to the servers of such social networks and the plugin may transmit your data to the social networks. Your use of these social plugins is subject to the privacy policies of the third-party social networks.

#### Your Choices and Updating Your Information

##### Communication Choices

We offer you certain choices about how we communicate with you and what information we collect from you. If you do not wish to receive these marketing materials or promotions from us, you may opt-out as forth in the message or changing your preference [here](#). You may also update your communication preferences by contacting us as indicated in the How to Contact Silvernest section below.

##### Updating Information

Silvernest provides you with the ability to review and update the account and profile information that you provide to us by accessing and modifying this information in your account online or by contacting us at [hello@silvernest.com](mailto:hello@silvernest.com).

If you would like to deactivate or delete your account, please go to the account deletion feature within your account.

#### How Silvernest Protects Your Information

We may employ procedural and technological measures that are generally consistent with industry practice. Such measures are reasonably designed to help protect your personal information from loss, unauthorized access, disclosure, alteration or destruction.

#### How Long Does Silvernest Retain Your Information

Silvernest retains personal information for as long as necessary to fulfill the purposes described in this policy, and as required by our record retention policies and the law.

#### Children’s Privacy

Our Site is not directed to children under the age of 18. Silvernest does not knowingly collect information from children under the age of 18. If we learn that a child under the age of 18 provided us with information, we will delete that information. If your child has provided information, please contact us so we can delete it. If you are under the age of 18, please do not provide us with your information.

#### How to Contact Silvernest

If you have any questions regarding this Privacy Policy contact us via email at [hello@silvernest.com](mailto:hello@silvernest.com) Attn.: Compliance Officer.

#### Privacy Policy Updates

Silvernest may update this Privacy Policy from time to time. Silvernest will post our updated Privacy Policy on our Site, along with notice that the Privacy Policy has been changed. If we make significant changes to the Privacy Policy, Silvernest may also send registered users that have provided us with their email address an email notification notifying such users of the any changes to the Privacy Policy. Silvernest encourages you to review this Privacy Policy regularly for any changes. Your continued use of this Site will be subject to the terms of the then-current Privacy Policy.