

## **Home Advisor**

Built on the foundation of increasing transparency of property quality and value, Home Advisor offers a growing database of property reviews. Unlike other real estate sites, all of this information is shared by those who know a property best — the former/current residents. In turn, searchers on Home Advisor are well-researched and more informed about the properties they consider buying or renting. This is why thousands of Canadians turn to Home Advisor to help them make real estate decisions for them and their families.

### **Home Advisor Privacy and Cookie Policy**

We, Home Advisor, explain in this Privacy and Cookie Policy (the “Policy”) how we collect, process and/or use information that we receive via our websites, emails we send, and mobile applications (collectively, the “Platform”) that link to this Policy, as amended from time to time. This Policy describes how Home Advisor collects, processes, uses, shares and secures the personal information you provide. It also describes your choices regarding use, access, and correction of your personal information. For purposes of this Policy, personal information shall mean any information relating to an identified or identifiable natural person.

Unless we specify otherwise, this Policy applies only to information we collect, process and use through the Platform. This Policy does not apply to information that we collect through other channels, such as information that we collect offline, from other websites or from emails you send us, unless we notify you at the time of collection that this privacy policy applies.

For the purposes of this Policy, “Home Advisor,” “we,” or “us” shall mean the following entities:

- Home Advisor, a registered Ontario business.

### **Information We Collect**

We collect information about you to provide our services. In order for us to best provide our services to you (and to help make it feasible for us to do so), it is essential that we are able to collect and use the information as described in this Policy. If you are a registered user of the Platform the data collection is largely necessary for fulfilling our contractual obligations towards you and, where neither of those is the case, alternative legal grounds serve as our legal basis for processing (i.e., consent, legal obligation, and legitimate interests—see details below).

### **Information You Give Us**

When you fill out registration forms, submit your reviews, or provide us with other personal information actively, we collect that information for processing and use in accordance with this Policy. Because we change our offerings and features from time to time, the options you have to provide us with personal information also may change, but here are some examples of situations in which you will have the opportunity to provide personal information to us:

- Creating an account
- Signing up for email alerts
- Completing a form related to one of our products or services
- Completing your Profile or preferences
- Sending messages through Home Advisor
- Contacting us for technical support or customer service

Depending on how you interact with our Platform, the personal information we collect from you may vary. For example, to create an account we may ask only for an email address and password. In other circumstances, such as when you complete a form related to a particular service offering, we may ask

you to provide other information, which may include your name, phone number, and/or postal address. We also collect and store certain information associated with actions you take. For example, when you search for properties, we store the address, locations and general information about the properties you search for and click on. We also may store information about the time and duration of your activity on our Platform, and other information about your behavior on our Platform. Because much of this information is necessary for us to provide you with our service, if you don't share this information you may not be able to use some features of the Home Advisor platform.

If you connect to the Platform using Facebook, Google+, or another social networking site (each a "Social Networking Site"), we will receive information that you authorize the Social Networking Site to share with us, which may include public profile information, birthday, current city work, school, and email address. When we receive this information, it becomes Home Advisor account information for purposes of your use of the Platform. This information also constitutes personal information and is therefore subject to this Policy. Any information that we collect from your Social Networking Site account may depend on the privacy settings you have set with the Social Networking Site, so please consult the Social Networking Site's privacy and data practices. You have the ability to disconnect your Social Networking Site account from your Home Advisor account by adapting the privacy settings in your Social Networking Site account. If you come to the Platform through a Social Networking Site, from other websites or with devices that enable third parties to collect information from or about you, such third parties receive information about you subject to their privacy policies.

On certain Home Advisor domains, when you set up an individual user account on the Platform, you may create a profile (a "Profile") that will include personal information you provide. Because your anonymity on our Platform is important, your Profile does not include information you submit to the Platform anonymously (for example, the reviews you submit anonymously).

We process, monitor, review, store and analyze such content and other materials, including via automated means, for data analysis, quality control, enforcement of our Terms, and improvement of our services. Examples of such improvements would be optimizing our search results, improving reviews, and preventing fraud and spam.

When you submit personal information to a third party and are informed at the time of collection that your information may be shared with us, we may collect that information for lawful marketing purposes.

Categories of personal information collected by Home Advisor may include email addresses, age, address, current living status, current type of residence, intentions to buy or rent a property, site activity (Pages you viewed and "like activity"), user feedback (Feedback you have provided Home Advisor via email, app/website and other channels). We may also collect Additional Personal and Demographic Information you may elect to give us, as set forth in further detail below.

### **Information We Collect Automatically**

When you use the Platform, your device is automatically providing information to us so we can respond and customize our response to you. The type of information we collect by automated means generally includes technical information about your computer, such as your IP address or other device identifier, the type of device you use, and operating system version. The information we collect also may include usage information and statistics about your interaction with the Platform. That information may include the URLs of our web pages that you visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, platform type, location data (if you have enabled access to your location on your mobile device), and other information about how you used the Platform.

*Automated means of data collection include the following:*

**Cookies And Tracking Technologies.** Technologies such as: cookies, web beacons, locally shared objects (sometimes called “flash cookies”), mobile identifiers and similar technologies (“Cookies”) are used by Home Advisor and our partners (such as advertising, marketing and analytics providers) (“Ad Partners”). We use Cookies to remember users’ settings as well as for authentication and analytics. These technologies may be used in analyzing trends, administering the Platform, tracking users’ movements around the Platform and to gather demographic information about our user base as a whole. Our Ad Partners may also use such technologies to deliver advertisements to you. You can control the use of Cookies at the individual browser level, but if you choose to disable Cookies, it may limit your use of certain features or functions on our website or service. For more information on Cookies, how we use them, the third parties we work with who use them, and how you can control them, please see the section of this policy entitled Cookie Policy and Ad Choices.

**Log File Information.** Log file information is automatically reported by your browser or mobile application each time you access a website on our Platform. For example, when you access a Home Advisor website, our servers automatically record certain information that your web browser sends when you visit any website. These server logs include information such as your web request, Internet Protocol (“IP”) address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, and pages viewed.

**Device Information.** We collect information about the device you use to access the Platform, including type of device, operating system, settings, and unique device identifiers, and IP address. Whether we collect some or all of this information often depends on what type of device you’re using and its settings. For example, different types of information are available depending on whether you’re using a Mac or a PC, or an iPhone or Android phone. We collect the device type and any other information you choose to provide, such as username, geolocation, or email address. We also use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software records information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

## **How We Use Information**

We use the information we collect to provide our services. In order for us to best provide our services (and to help make it feasible for us to do so), it is essential that we are able to collect and use the information as described in this Policy.

As a registered user of our Platform, Home Advisor processes your information in accordance with our contractual obligations based on the Terms of Use and, where this is not the case, alternative legal grounds serve as our legal basis for processing (i.e., consent, legal obligation, and legitimate interests) including personal information for the following purposes:

- To provide you with personalized content, services and offers of services offered by Home Advisor, as well as other promotional content and services (for example, Home Advisor and its affiliates may use your previous search and browsing history (e.g. the reviews you click on), to determine relevant search results and provide you with recommended reviews on Home Advisor or on sites of Home Advisor affiliates; we also use your IP address and mobile device for these purposes); For the purposes of this Policy, “affiliates” means any entity that directly or indirectly, controls, is controlled by, or is under common control of or with Home Advisor, now or in the future. “Control” for these purposes means having a majority of shares or the right and ability to direct management.
- To moderate and display the property reviews and other content you have submitted for the benefit of our other users;
- To customize and improve the features, performance, and support of the Home Advisor site and sites of Home Advisor affiliates;

- To communicate with you or initiate communication with you (for marketing or service-related purposes) on behalf of third parties through your Home Advisor account or through other means such as email, telephone (including mobile phone), or postal mail, including through the use of contact information that you provide to us or (where it is lawful for us to do so) that we otherwise obtain from third-party resources;
- To provide relevant advertising, including interest-based advertising from us and third parties, which may mean that we share non-personally identifiable information, such as your age, current living status and type of domicile and rent or buy intentions;
- To allow Home Advisor and Home Advisor affiliates to process your personal data for the purpose of improving for internal operations, including detecting and preventing fraud and spam, troubleshooting, data analysis, testing, research, and service improvement (this includes use of your IP address and mobile device information to help diagnose problems with our service and to administer the Platform);
- To create aggregated statistical data that does not identify you individually and that we can commercialize (for example, we use mobile device data and IP addresses to create anonymized, aggregate demographic information);
- For other purposes that you separately authorize as you interact with Home Advisor.

When we collect any information that does not identify you as a specific natural person (“Non-Personal Information”), we are permitted to use and disclose this information for any purpose, notwithstanding anything to the contrary in this Policy, except where we are required to do otherwise by applicable law. Examples of Non-Personal Information include: physical location information; demographic information, including gender, dates of birth, postal codes, etc.; or any personal information that has been anonymized, aggregated or de-identified. If we combine any Non-Personal Information with your personal information (such as combining your postal code with your name), we will use and disclose such combined information as personal information in accordance with this policy. Similarly, if applicable law requires that we treat certain Non-Personal Information as personal information, we will use and disclose this information as personal information in accordance with this policy.

### **How We Share Information/Recipients**

We only disclose your personal information to third parties as follows:

- We may also share your information with Home Advisor affiliates, namely any entity that directly or indirectly controls, is controlled by, or is under common control with Home Advisor. Such affiliates shall process your personal data either (1) at our direction as a processor under a contractual relationship, (2) as a separate controller of your information where you are informed at the time of collection or processing of their relationship to you, or (3) where we believe it is necessary for the purposes of a legitimate interest, and where such purposes are aligned with those for which you provided your personal data to us. These instances and processing activities are outlined in the “How We Use Your Information” section above and will include data falling into the categories described in the section “Information You Give Us”.
- We will disclose data if we believe in good faith such disclosure is necessary (1) to comply with relevant laws or to respond to subpoenas or warrants or legal process served on us (though we reserve the right to take action on behalf of our users to defend their right to anonymity when we believe there is a legitimate basis to do so, because candid, lawful, anonymous free speech is fundamental to Home Advisor’s mission of workplace transparency); (2) to enforce our [Home Advisor Terms of Use](#) and this Privacy Policy; (3) 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 illegal activity; (4) as we otherwise deem necessary and is permitted by applicable laws to protect and defend the rights or property of us, the users of our services, or third parties; or (5) as permitted under applicable laws to meet national security and similar requirements;

- In reorganization or sale of our company or assets, your data may be transferred, subject to the acquirer and its affiliates accepting the commitments made in this Policy and compliance with applicable law;
- We share certain information that does not identify you personally, but which is unique to your use of the Platform, such as searches that you have made. When we share such information, we do not link search information with your name when we provide this information to others, such as advertisers or affiliates;
- We will otherwise share personal information with your consent.
- As described in this section, Home Advisor may share your data with our affiliates. When we share this data, this may be considered a “sale” under applicable law.

## **The Legal Basis on Which Home Advisor Processes Your Personal Data**

Home Advisor collects and processes your personal information on the basis of different legal grounds, depending on the nature of the personal information being provided and the type of processing involved.

### *Performance of a Contract*

Most of the personal Data processed by Home Advisor is performed on the basis that it is necessary for the performance of our agreements with you (among them, your agreement to our Terms of Use and this Policy), or in order to take steps at the request of the user prior to entering such an agreement.

### *Legitimate Interest*

A second ground relied upon by Home Advisor for other types of processing of your personal information is that it is necessary for the purposes of legitimate interests pursued by Home Advisor. Such legitimate interests may include where Home Advisor sends you marketing about our products and services or where we believe you have a reasonable expectation that we will perform a particular type of processing on your behalf. A further example would be where Home Advisor shares your personal information with our affiliates as detailed in the “How We Share Information/Recipients” section above. Home Advisor will only rely on such a ground where an assessment has been performed balancing the interests and rights involved and the necessity of the processing in order to provide our services, products and features to you.

### *Compliance with a Legal Obligation*

A third ground relied upon for certain types of processing is that it is necessary in order to allow Home Advisor to comply with a legal obligation. An example of this would be where Home Advisor is required to retain business records for fixed periods of time or transmit them to a user in order to comply with local legal requirements.

### *Consent*

Finally, in certain limited situations, Home Advisor relies on your consent in order to process your personal information. Where Home Advisor requires your consent in order to collect and process certain personal information, we seek your consent at the time of provision, and such processing will only be performed where consent is secured unless Home Advisor has another lawful basis on which to rely. For example, your consent may be sought where you submit feedback to Home Advisor, or in certain instances where you initiate a marketing message or other communication with Home Advisor.

## Cookie Policy and Ad Choices

This Cookie Policy describes how Home Advisor uses Cookies and similar technologies.

### Cookies

Cookies are small pieces of data that are stored on your computer, mobile phone, or other device when you first visit a page. We use cookies, web beacons, locally shared objects (sometimes called “flash cookies”), mobile identifiers and similar technologies (“Cookies”) to help us recognize you on the Platform, enhance your user experience, understand usage of the Platform, and show you relevant advertising. Cookies may also be set by other websites or services that run content on the page you’re visiting. After you register on the Platform, we may connect information we collect from the Cookies set by us and our partners with other information received from you. The provision of your data via Cookies is voluntary except for those Cookies that we place on your device because we need them for the performance of our Platform and our services.

### What types of Cookies do we use?

We use two types of Cookies on the Platform: “session cookies” and “persistent cookies.” Session Cookies are temporary Cookies that remain on your device until you leave the Platform. A persistent Cookie remains on your device for much longer until you manually delete it (how long the Cookie remains will depend on the duration or “lifetime” of the specific Cookie and your browser settings).

### What are Cookies used for?

Cookies transmit information about you and your use of the Platform, such as your browser type, search preferences, reviews, data relating to advertisements that have been displayed to you or that you have clicked on, and the date and time of your use. With the exception of an identifier Cookie that we associate with registered accounts to prevent fraud by members of the Platform, Cookies link to certain unique information such as the data that you entered at time of registration or on your profile, but this is not linked to your name. We use four types of cookies: Strictly Necessary, Functional, Analytics, and Targeting.

### We use Cookies for things like:

Purpose	Explanation
Authentication	We use Cookies to help us determine whether or not you’ve signed in to the Platform and to keep you signed in during visits as you access different pages.
Security	We use Cookies to enable and support security features, prevent fraud, and protect your data from unauthorised access.
Preferences and Features	We use Cookies to enable features and help us provide you with personalised content, such as showing you your recent search activity.
Advertising	We use Cookies to deliver, evaluate and improve advertising, such as by using information about you to provide relevant advertising both on and off the Platform. Our Ad Partners may use a cookie to determine whether you’ve already been shown an advert or how it performed, or provide us with information about how you interacted with an ad.
Analytics and Performance	We use Cookies to analyze how our visitors use the Platform and to monitor site performance. These Cookies help us to identify and fix errors, understand and improve services, research and test out different features, and monitor how our visitors reach our sites.

## Targeting Cookies: Ad Choices and Managing Cookies

Home Advisor works with several third parties to provide you with personalized, interest-based advertising. We may target ads to you, and measure their performance, on and off the Platform using:

- Member-provided profile information (e.g. registration information, authorized information shared from your Social Networking Site)
- Your use of the Platform (e.g., search history, reviews);
- Information inferred from data described above (e.g. demographic information property rent/purchase intentions).
- IP address or mobile device location information (to the extent you have enabled location tracking on your device);
- Cookies (both on and off the Platform) which may include information from the Ad Partners we use to help deliver relevant ads to you.

## How We Work with Third-Party Ad Partners

When we work with our Ad Partners to serve you personalized, interest-based advertising, we do not share information with them that they can use to identify you or associate with you as a specific individual unless you have instructed us to do so (such as when you fill out a lead form in an ad, or approve your Profile for display to employers). Similarly, if one of these Ad Partners has information about you saved in one of their own Cookies on your browser, they use that information to help us send you a relevant ad, but they do not share with us information that we can associate with you as an individual.

We work with third parties, such as Google Analytics, to provide analytics services that use the Cookies set on your device to measure the performance of advertising and track traffic to Home Advisor generally. We have also implemented [Google Analytics Demographics and Interest Reporting](#), which categorizes Cookie information so that we and third-party service providers can better deliver advertisements that are relevant and useful to you on the Platform and various websites across the internet. In addition, a Cookie on some of our employer clients sites provides us with aggregate data about the number of applications submitted to those sites by users of Platform.

## Consenting to Cookies and Opting Out of Cookies

As we described, we use Cookies that are strictly necessary for us to provide the services you use and you cannot opt out of these Cookies on the Platform. You are also able to disable placement of some (but not all) Cookies by setting your browser to decline cookies, though this may worsen your user experience. Additionally, you can also control, manage and/or delete cookies via your browser settings. A useful resource for information about deleting and controlling cookies can be found at [AboutCookies.org](http://AboutCookies.org).

If you enable location data for the mobile version of the Platform (including any version installed as a native application), we may use your location data to serve you geo-targeted ads for employers and other advertisers that are local to you. In such instances, we do not share your location with the advertiser or advertising network; rather, we provide the advertiser or advertising network with a means to push ads through to users located in certain areas. You may disable location services at any time in your device privacy settings or the Home Advisor native app settings.

## Ad Partner Cookies

Here are some options for managing the third-party Cookies used by our Ad Partners:

*Please note:* If ads or other features on the Platform are provided by third parties, those parties set and use their own Cookies that are subject to those third parties' privacy notices and policies. Home

Advisor does not have access to, or control over, these Cookies. Also, if you respond to ads posted by third parties or submit information to third parties via the Platform, such third parties receive information about you subject to their privacy policies.

### **Do Not Track Signals**

We do not currently respond to 'do not track' signals and similar settings or mechanisms. When you use the Platform, we try to provide a customized experience.

### **Other Important Privacy Information**

#### **Your Privacy Rights**

Home Advisor operates nationally within Canada and is therefore subject to a variety of data privacy laws that confer a range of privacy rights upon our users. We have chosen to provide all of these privacy rights to our users regardless of their location.

Home Advisor does not process your information for the purpose of making automated decisions about you which has a legal or other significant effect.

Home Advisor does not discriminate against users' that exercise any of these privacy rights. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We will respond to all requests within a reasonable timeframe. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

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

We keep your personal information only so long as we need it to provide the Platform to you and fulfill the purposes described in this Policy. This is also the case for anyone that we share your personal information with and who carries out services on our behalf. Retention periods can vary significantly based on the type of information and how it is used. Our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When we no longer need to use your personal information and there is no need for us to keep it to comply with our legal or regulatory obligations, resolve disputes and enforce our agreements, we'll either remove it from our systems or depersonalize it so that we can't identify you.

#### **Security Safeguards**

**Security.** We employ physical, electronic, and managerial measures to safeguard the information we collect online. However, no company can fully eliminate security risks, so we cannot make guarantees about any part of our services. You are responsible for keeping your username and password secret. Once you have registered with us, we will never ask you for your password. Please create a unique password for your Home Advisor account and do not use it for any other web services or applications. Do not share your password with anyone else.

#### **Privacy of Minors**

To access or use the Platform you must be at least 16 years of age or, if older, the age of majority in your jurisdiction, otherwise you may not use the Platform. If you become aware that a child has provided us with personal information without parental consent, please contact us [here](#). If we become aware that a child has provided us with personal information without parental consent, we remove such information and terminate the child's account.



## **Updates to Our Privacy Policy**

We may revise this Policy from time to time by posting an updated version on the Platform. The revised Policy will be effective immediately for unregistered users and users registering accounts or otherwise acknowledging the Policy on or after the revision date. For other users who registered accounts before the revision date, it will also become effective immediately. However, they can object to the new Policy within thirty (30) days after the revision date. If we make a change that we believe materially reduces your rights or increases your responsibilities, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this website prior to the change becoming effective. We may provide notice of changes in other circumstances as well. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the Platform is subject to the most current effective version of this Policy. If you object to the Policy after it becomes effective for you, you may no longer use the Platform.

## **Contact Us**

If you have any questions or suggestions regarding this Policy, please contact us [here](#).