

Privacy Policy of Keller Williams Real Estate Cayman Islands

Maison Properties Ltd. is a Cayman Islands registered limited liability company and operates in the Cayman Islands pursuant to a Market Centre Licence Agreement granted by KW Worldwide Ltd. and is licenced to trade as "Keller Williams".

Effective Date: 12th June 2025

Welcome to Keller Williams Real Estate ("**KWRE**") ("we," "us," or "our"). We are committed to protecting your privacy and ensuring your personal information is handled securely and responsibly. The Data Protection Act (as amended) and its regulations govern private policy for the Cayman Islands. This Privacy Policy explains how we collect, use, disclose, and safeguard your information, describes our practices in connection with information that we collect about you as an individual consumer, contractor or agent, employee, when you visit our website <u>www.kellerwilliams.ky</u>

SECTION 1: PERSONAL INFORMATION

"**Personal Information**" is information that identifies you as an individual or relates to an identifiable individual. The categories of Personal Information we may collect depend on your relationship with KWRE. We may collect Personal Information from you via the services when you choose to share it with us, including the following categories:

- For individual consumers:
 - <u>Identifiers</u>, such as a real name, postal address, Internet Protocol address ("**IP Address**"), date of birth, email address, telephone number, account name, or other similar identifiers, along with any other Personal Information you share with us while using our services which is not covered by a category below,
 - <u>Commercial information</u>, such as your real estate buying/selling interests or preferences,
 - <u>Financial information</u>, such as your mortgage loan balance, payment card number, billing address, and related financial information, is collected when you choose to share it with us,
 - Geolocation data, which may be derived from your IP address or mobile device,
 - <u>Information from your device</u>, such as your location, when you choose to share it with us,
 - <u>Account information</u>, including your account log-in information for third-party websites, services, or applications, like Facebook and Google, when you choose to link these accounts to KWRE Websites or KWRE Apps and,
 - <u>Other information</u> (as defined below), to the extent we must treat such information as Personal Information under applicable law.
- For KWRE Agents:
 - <u>Identifiers</u>, such as a real name, postal address, IP Address, date of birth, email address, telephone number, account name, or other similar identifiers, along with



- any other Personal Information you share with us while using our services, which is not covered by a category below,
- <u>Financial information</u>, such as your bank account number, payment card number, billing address, and related financial information, is collected when you choose to share it with us,
- <u>Professional or employment-related information</u>, such as your current occupation, level of completed education, and realtor license number,
- Geolocation data, which may be derived from your IP Address or mobile device,
- <u>Information from your device</u>, such as your device's contacts, photos, and location, when you choose to share them with us,
- <u>Account information</u>, including your account log-in information for third-party websites, services, or applications, like Facebook and Google, when you choose to link these accounts to KWRE Websites or KWRE Apps, and
- <u>Other information</u> (as defined below), to the extent we are required to treat such information as Personal Information under applicable law.

Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

Directly through any service when you provide it to us.

- We collect Personal Information through the services, for example, when you fill out a user profile when using our services, register an account to access the services, fill out and submit an online contact form to us when using our services, request a market analysis of your home, or contact us by telephone or email,
- If you are a KWRE Agent, we may receive your Personal Information as part of your professional relationship with us, with KW® Market Centre(s), or by using any related services.

Automatically, when you use our services

• We may automatically collect Personal Information through the services, for example, through our use of cookies, pixel tags, and other similar technologies as further described in the "*Other Information*" section of this Privacy Policy.

From other sources

- We may receive your Personal Information from other sources, including:
 - When KW® Market Centres or their KW® Agents provide us with any information you share directly with them for the purpose of providing you with the services on our behalf,
 - Publicly available databases and
 - Joint marketing partners or vendors when they share this information with us.



We collect Personal Information to provide the requested services, improve our existing services, and develop new products or services. If you do not provide the personal information we requested, we may be unable to provide you with the requested services.

Use of Personal Information

We and our service providers use Personal Information for the following legitimate business purposes:

Providing the functionality of our services and fulfilling your requests, including:

- To provide the services' functionality to you, such as arranging access to your registered account and providing you with related user support services,
- To respond to your inquiries and fulfil your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions or comments or when you request other information about our services,
- To send administrative information to you, such as changes to our terms, conditions and policies,
- To allow you to send messages to another person through the services if you choose to do so, and
- If you are a KWRE Agent or KW® Agent or affiliated with Keller Williams, to process your registration to attend a Keller Williams event, to contact you in an emergency, or to further engage with you, as necessary, to support your business relationship with a KW® Market Centre.

We will engage in these activities to manage our contractual relationship with you and to comply with a legal obligation.

Providing you with marketing materials and facilitating social sharing, including:

- To send you marketing-related emails and serve you advertisements with information about our services, new products, and other news about us, and
- To facilitate the social sharing functionality that you choose to use.

We will engage in this activity with your consent to the extent required by applicable law or where we have a legitimate business interest.

Analysing Personal Information for business reporting and providing personalised services, including:

- To analyse or predict our users' preferences to prepare aggregated trend reports so we can improve our services,
- To better understand your interests and preferences, we can personalise our interactions with you and provide you with information or offers tailored to your interests and
- We aim to better understand your preferences so that we can deliver relevant and interesting content through our services.



We will provide personalised services based on our legitimate interests and with your consent to the extent required by applicable law or where we have a legitimate business interest.

Allowing you to participate in contests or other promotions.

- We may offer you the opportunity to participate in a sweepstakes, contest, or other promotion.
- Some of these sweepstakes, contents, or other promotions have additional rules containing information about how we will use and disclose your Personal Information. Please read those additional rules before choosing to participate.

We use this information to manage our contractual relationship with you.

Aggregating or anonymising Personal Information.

• We may aggregate or anonymise Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our legitimate use, which we may use and disclose for any purpose as long as it no longer identifies you or any other individual. We may use non-personally identifiable information, such as anonymized or aggregated Services usage data, in any manner that does not identify individual users to improve the operation and management of the Services, including to develop new features, functionality, and services, to conduct internal research, to understand usage patterns better, to resolve disputes, to troubleshoot problems, to fulfil user requests, or for security and compliance purposes. We will treat any non-personally identifiable information.

Accomplishing our legitimate business purposes, including:

- For data analysis, for example, to improve the efficiency of our services,
- For audits, to verify that our internal processes function as intended and to address legal, regulatory or contractual requirements,
- For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft,
- For developing new products and services,
- For enhancing, improving, or modifying our current products and services,
- For identifying usage trends, for example, understanding which parts of our services are of most interest to users,
- To determine the effectiveness of our promotional campaigns so that we can adapt our campaigns to the needs and interests of our users and
- For operating and expanding our business activities, for example, we need to understand which parts of our services are of most interest to our users so we can focus our energies on meeting their interests.

We engage in these activities to manage our contractual relationship with you, comply with a legal obligation, or promote our legitimate business interests.



Disclosure of Personal Information

We may disclose all Personal Information categories identified in the "*Personal Information*" section of this Privacy Policy to the following groups:

- To our Licensor and its Licensees and affiliates for the purposes described in this Privacy Policy.
- To our third-party service providers and business partners to perform functions on our behalf (for example, to support the delivery of KWRE Websites and KWRE Apps).
 - These can include providers of services such as data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, user support service, email delivery, auditing, and other services.

To our KW® Market Centres or their KW® Agents, where you have completed an online contact form or otherwise requested such sharing, inquiring about a property, or when we have a legitimate business interest.

To our Keller Williams® regional representatives, when we have a legitimate business interest.

To third-party sponsors of sweepstakes, contests, and other similar promotions.

To our third-party business partners for marketing purposes.

• Consistent with applicable law, we may share your personal information with selected third-party business partners for their own business purposes, including enabling them to send you information about products and services that may interest you, consistent with your choices.

By using the services, you may elect to disclose Personal Information.

• You can voluntarily post information and content on message boards, chat, blogs, and other services. Please note that any information you post or disclose through these services will become public and may be available to other users and the general public.

As of the date identified in the "*Last Updated*" legend at the top of this Privacy Policy, we do not "sell" Personal Information (as such terms are defined under applicable law).

Other Uses and Disclosures

We also use and disclose your Personal Information as necessary or appropriate, particularly when we have a legal obligation or legitimate business interest to do so:

To comply with applicable laws and regulations, including laws outside your country of residence.

To cooperate with public and government authorities.

- We need to respond to a request or provide important information.
- These can include authorities outside your country of residence.

To cooperate with law enforcement.



• For example, when we respond to law enforcement requests and orders or provide information, we believe is necessary or appropriate.

For other legal reasons, including:

- To enforce our terms and conditions.
- To protect our rights, privacy, safety or property, or that of our affiliates, yours, or others.
- In connection with a sale or business transaction.
 - We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

SECTION 2: OTHER INFORMATION

"**Other Information**" is any information that does not reveal your specific identity. The services may collect Other Information, including:

- Browser and device information,
- App usage data,
- Information collected through cookies, clear gifs, pixel tags, single-pixel gifs, and other similar technologies,
- Demographic information and other information provided by you that do not reveal your specific identity, and
- Information that has been aggregated so that it no longer reveals your specific identity.

Collection of Other Information

We and our service providers may collect Other Information in a variety of ways, including:

Through your browser or device

• Certain information is collected by most browsers or automatically through your device, such as your Media Access Control address, computer type (e.g., Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the services you are using. We use this information to ensure that the services function properly.

We may use third-party tools to automatically collect information about how you use our services. This information includes any actions you take on KW Websites or KW Apps, including links visited, session details and duration, and what you type into the KW Websites or KW Apps. This information is collected to help us identify how our users use our services, to ensure our services are working correctly, and to improve how and what we offer our services.

Through your use of the KWRE Apps

• When you download and use the KWRE Apps, we and our service providers may track and collect usage data, including the date and time the KWRE App is used on your



• Device accesses our servers and what information and files have been downloaded to the KWRE App based on your device number.

Using cookies

Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information, including browser type, time spent on the services, pages visited, language preferences, and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, to improve the services, and to personalise your experience. We also gather statistical information about the use of the services to continually improve their design and functionality, understand how they are used, and assist us with resolving questions regarding them. Cookies further allow us, KW® Market Centres or KW® Agents, to select which of our advertisements or offers are most likely to appeal to you and display them while you are using the services. We may also use cookies or other online advertising technologies to track our ads' responses. Relatedly, advertising networks may collect Personal Information using cookies, and most advertising networks offer you a way to opt out of targeted advertising.

Using pixel tags and other similar technologies

Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of our services (including email recipients), measure the success of our marketing campaigns, serve you with advertisements, and compile statistics about service usage and response rates.

We may use analytics services, including Google Analytics, which uses cookies and similar technologies to collect and analyse information about the use of the services and report on activities and trends. This service may also collect

information regarding the use of other websites, apps, and online resources. You can learn about Google's practices by going to https://policies.google.com/technologies/partner-sites and exercising the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at https://tools.google.com/dlpage/gaoptout.

Physical Location

We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide personalised location-based services and content. We may also share your device's physical location, what advertisements you viewed, and other information we collect with our marketing partners to enable them to provide you with more personalised content and study the effectiveness of advertising campaigns. Sometimes, you can allow or deny such uses or sharing of your device's location. Still, if you do, we or our marketing partners may not be able to provide you with the applicable personalised Services and related content.



Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose except where otherwise required under applicable law. Suppose we are required to treat Other Information as Personal Information under applicable law. In that case, we may use and disclose it for the purposes we use and disclose Personal Information as detailed in this Policy. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

SECTION 3: SECURITY

We seek to use reasonable organisational, technical, and administrative measures to protect Personal Information within our organisation. Unfortunately, no data transmission or storage system can be guaranteed 100% secure. If you have reason to believe that your interaction with us is no longer safe or that you have identified a security vulnerability, please immediately notify us using the "Contacting Us" section below.

SECTION 4: CHOICES AND ACCESS; PRIVACY RIGHTS Opting Out of Marketing Communications

We give you choices regarding our use of your Personal Information for marketing purposes. You may opt out of receiving marketing-related emails from us. If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt out by emailing us. If you choose to send an email, please clearly state in the subject line or the body of the email that you are requesting that we unsubscribe you from all marketing-related emails we send. If you would like to opt out of receiving marketing-related emails from one of our KW® Market Centres or their KW® Agents, please get in touch with us by emailing us.

<u>Right to Correct Information</u>. You have the right to request that we update any incorrect personal information in our systems.

<u>Right to Delete</u>. You have the right to request that we delete any Personal Information about you that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) the Personal Information from our records unless we are restricted pursuant to the applicable laws and regulations in the Cayman Islands.

SECTION 5: PHONE CALLS AND TEXT MESSAGES, AND OTHER SERVICES

- You must be 18 years of age before any services can be provided to you
- Persons under 18 years of age can only enter legal binding contracts in the Cayman Islands under very limited conditions

Call Monitoring and Recording

If you communicate with us by telephone, we may monitor or record the call in accordance with applicable law.



Express Written Consent

By sharing your telephone number with us, you agree that we may contact you at your provided telephone number and email address.

SECTION 6: RETENTION PERIOD

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable laws of the Cayman Islands.

To determine the appropriate retention period for Personal Information, we consider the following:

- The amount, nature, and sensitivity of the Personal Information we maintain about you,
- The length of time we have had, and expect to continue to have, an ongoing relationship with you and provide the services to you (for example, for as long as you have an account with us or keep using the services),
- The potential risk of harm from unauthorised use or disclosure of your Personal Information,
- The purposes for which we process your Personal Information and whether we can achieve those purposes through other means,
- Whether there is a legal obligation to which we are subject (for example, specific laws require us to keep records of your transactions for a particular period before we can delete them),
- Whether retention is advisable in light of our legal position (such as regarding applicable statutes of limitations, litigation or regulatory investigations) and
- Our internal policies regarding the retention of records.

SECTION 7: THIRD-PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including KW® Market Centres, KW® Agents, or any third party operating any website or service to which the services link. Including a link on the services does not imply endorsement of the linked site or service by us or our affiliates.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organisations, including Apple, Meta, Instagram, Google, Microsoft, RIM, or any other app developer, app provider, operating system provider, wireless service provider or device manufacturer, including concerning any Personal Information you disclose to other organisations through or in connection with the services.

SECTION 8: USE OF SERVICES BY MINORS

Our services are not directed towards or intended for use by individuals under the age of 18, and we do not knowingly collect or solicit Personal Information from individuals under the age of 18. Please email us if you believe we collected Personal Information from an individual under 18.

SECTION 9: SENSITIVE INFORMATION

Unless we request it, please do not send us through the services or otherwise disclose to us any sensitive Personal Information, including social security numbers, payment card or account information, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background information, or trade union memberships.



Cayman Islands Laws and Regulations require real estate brokers and agents to collect personal information on all clients they provide services to unless the laws and regulations exempt them from collecting such personal data. This data includes governmental identification information, address verification, source of funds verification and other personal data. When this information is collected, disclosure can be made without your consent to law enforcement agencies and pursuant to court orders.

SECTION 10: UPDATES TO THIS PRIVACY POLICY

The "*Last Updated*" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the services. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you and periodically visiting this Privacy Policy to check for any changes. Following any changes, your continued use of the services means you accept the revised Privacy Policy. If you disagree with our policies and practices outlined in this Privacy Policy, you can discontinue using the Services.

SECTION 11: CONTACTING US

If you have questions or concerns about this privacy policy or our data practices, please get in touch with us at:

Keller Williams Real Estate The Strand, Unit 31, 46 Canal Point Drive, Grand Cayman, Cayman Islands Email: hello@kellerwilliams.ky Phone: 1.345.746.5959

You can contact the Cayman Islands Data Protection Ombudsman if you wish to make a formal complaint. Ombudsman P.O Box 2252 Grand Cayman, KY1-1107 https://ombudsman.ky/data-protection