

# Exeter Property Group – Website Privacy Policy

Exeter Property Group (“**Exeter**”) is committed to preserving the confidentiality of all individually identifiable and proprietary information about our clients, potential clients, and employment candidates. By visiting or submitting data through this Website, you are accepting and consenting to the provisions set forth in this Privacy Policy. If you do not agree to this Privacy Policy, you are instructed not to use this Website.

**Scope** - This Privacy Policy covers only data collected through the Website ("**Data**") and not any other data collection or processing, including, without limitation, data collection practices of other webpages to which we link or data that we or our affiliates collect offline or through web pages that do not display a direct link to this Privacy Policy.

## **Types of Data and Collection Methods –**

Passively Tracked Data: During your use of this Website, Exeter may, itself or through a third party vendor, passively collect technical and usage Data from you, the User, pertaining to your computer and/or Internet connection. Such Data may include the number and frequency of your visits to this Website, information regarding websites accessed immediately before and after your visit to this Website, your Internet browser type, your preferences on our Website, and IP address. The technical and usage Data may be used by Exeter to keep you informed about software compatibility issues and upgrades, to assist Exeter’s web design team in maintaining and improving this Website, and to enhance and/or personalize your visits to this Website. This technical and usage Data may be collected using "cookies", which is technology commonly used on other websites, or other similar means. In some instances, we use cookies to collect Data in connection with future visits from the Website, to recognize you as a previous visitor and to track your activity on the Website. You do not need to have cookies turned on to visit our Website and can refuse cookies by turning them off on your browser. However, it is possible that you may not be able to utilize all the Website's features if you choose to do so.

Actively Tracked Data: Exeter may also collect and store Data, or engage a third party vendor to collect and store Data, voluntarily provided by you, the User, while visiting this Website. User provided Data may include client login data, contact information, information related to the business you represent, information related to the financial information services you have requested, or information provided while seeking employment at Exeter, including but not limited to your resume or other personal information. In each such instance, you will know what Data we collect through the Website, because you actively submit it to us.

Combinations: Unless you also actively submit personal information, such as your name or address, passively tracked Data does not typically allow us to identify you personally. To the extent permitted by applicable law, we reserve the right to combine passively tracked Data with personal Data that you actively submit.

**Collection Purposes, Use of Data** - We generally collect Data for purposes of administering, protecting and improving our Website and our systems, to better understand the preferences of our Website visitors, to identify server problems, to compile aggregated statistics about Website usage, to help personalize your experience of our Website, and to respond to your particular requests or submissions, *e.g.*, an application for employment that you submit. When an individual representative of an Exeter client or potential client submits Data in connection with the use of Exeter’s products or services, we collect and process the Data as a data processing agent. In other words, we collect and process the Data only for the client’s benefit, and for the purpose(s) for which you originally sent us the Data (*e.g.*, to provide the services or products you requested).

**Disclosures of Personal Information** - Exeter will not sell or rent your personal and/or proprietary Data to anyone except as follows: we freely share your Data with our affiliates. We also share your Data with agents and service providers who use the Data, under confidentiality agreements, for our purposes only and only under our instructions, e.g., third parties who provide us on-site web analytics services (for example, website tracking, content delivery, etc.). We may share your Data as required by law or in the interest of protecting or exercising our or others' legal rights, e.g., without limitation, in connection with requests from law enforcement officials and in connection with court proceedings. We may share or transfer your Data in connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business. Also, we reserve the right to fully use and disclose any Data collected via the Website that is not in personally identifiable form.

**Access** - If personal Data you have submitted through the Website is no longer accurate, current, or complete, and you wish to update it, please send an e-mail to [compliance@exeterpg.com](mailto:compliance@exeterpg.com). Upon appropriate request we will usually be glad to update or amend your information, but we reserve the right to use Data previously obtained to verify your identity or take other actions that we believe are appropriate.

**Security** - Transmissions over the Internet are never 100% secure or error-free. However, with respect to our internal security procedures, Exeter takes reasonable steps to maintain physical, electronic, and procedural safeguards in order to protect your personal Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Exeter also requires third party companies that we hire and to whom we disclose Data to keep such information confidential and to use it only to perform the services for which we hire them and only under our instructions.