

# ***Privacy Policy***

**Updated: October 10<sup>th</sup>, 2022**

Flagstar Equity understands the Importance of online privacy. The following policy outlines how we do business, what information we collect and how, under what circumstances the information is shared with third parties, and your options to control what communications you receive from us and from our marketing partners. If you have any questions or concerns about this Privacy Policy, Please contact us.

## **Information We Collect And How It Is Used**

In order to participate in this promotion, you must first complete the OPT IN Registration information requested on the website. We ask for a Cell phone number and an email address so that we may contact you if necessary and we ask for a mailing address so we know where to ship the products that you have chosen pertaining to our special offers.

Registering for this promotion automatically subscribes you to the Flagstarequity.com Newsletter, A periodic email communicating various offers that we think you might like based on the registration information you provided, and any offers that you selected in this promotion. Users may unsubscribe from the newsletter at anytime by clicking on the automated link provided at the end of the email. The user also agrees to receive 1 one-time SMS message allowing them to OPT in for more information about our EBS program and the enrollment process to take advantage of those services. (Messaging and date rates may apply) Once OPTED IN for our SMS campaign the user may receive up to 4 messages per month outlining the promotions we are offering. The user can OPT OUT at any time by replying “stop” to any of those messages.

We request a limited amount of personally identifiable information from users who participate in the promotions on this site. This information includes, but is not limited to the following:

- Email address
- Name
- Address, City, state, zip
- Phone number
- SSN
- D/O/B
- Checking & Routing number for final enrollment

We use information provided by our users to enhance their experience on this and similar Web sites. We also use the information provided voluntarily to send out electronic mailings for offers that we think will be of interest to you. At all times, Users have the option to unsubscribe from such mailings by clicking on the unsubscribe link provided on each mailing.

We create internal reports on user demographics and traffic patterns to measure the effectiveness of our marketing campaigns and promotions, and to report results to our marketing partners. We do not use any personally identifiable information to compile these reports.

Participating lenders may request additional demographic and/or personally identifiable information for their use in subsequent marketing and promotion activities, and their privacy policies, and terms and conditions may differ from Flagstar Equity LLC. It is solely your responsibility

to read our Sponsors privacy policies, and terms and conditions, and to determine whether you agree or disagree.

Some of the third party advertisers that we use have their own privacy policies and may allow you to opt out of having your information collected as discussed above.

## **How We Collect Information**

The Company gathers information in the following ways:

### **Cookies**

A cookie is a small text file stored on a user's computer for record-keeping purposes. The Company uses cookies only to enable users to be routed properly through our site. We also provide links to external advertisers and marketing Partner companies; these sites may choose to use cookies to better promote their products and services. These advertisers and marketing partner companies have their own privacy procedures and policies that are not controlled by the Company.

We encourage our users to be aware of the individual privacy policies of every Web site that the user contacts.

### **Clear Gif's (Web Beacons/Web Bugs)**

The Company may also use a software technology called clear gif's that help us determine what content on our site is most effective. Clear gif's are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. We do not tie the information gathered by clear gif's to our customers' personally identifiable information.

We also use clear gif's in our HTML-based emails so that we know which emails have been opened. We use this information to monitor the effectiveness of our email campaigns and to validate our results to our marketing partners.

Notwithstanding anything else herein, we may partner with third party advertisers who may (themselves or through their partners) place or recognize a unique cookie on your browser. These cookies enable more customized ads, content or services to be provided to you. To trigger these cookies, we may pass an encrypted or "hashed" (non-human readable) identifier corresponding to your email address to a Web advertising partner, who may place a cookie on your computer. No personally identifiable information is on, or is connected to, these cookies. To opt-out of these cookies, please go to <http://www.privacychoice.org/choose> or [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

### **Log Files**

Log files are also used to track and monitor traffic patterns on our site. They are not used to track or monitor personally identifiable information.

## **Tell-A-Friend**

Users may forward the email address of another person who may also be interested in this particular offer. The information is used only to forward the information to that person and is not retained for any other purpose.

## **User Feedback/Inquiries**

Users may contact the Company with any feedback, questions or comments. The Company uses contact information only to respond to the feedback.

## **Other Circumstances**

Subsequent to this promotion, the Company may sponsor sweepstakes, contests or other events for which we need to collect and retain personally identifiable information. The Company may co-sponsor such events with other companies.

## **Information We Share**

This Privacy Policy applies to consumers that have signed up on the Flagstarequity.com website. We may sell, brand or share your personal information that you supply to us with other 3rd party businesses so they can bring selected retail opportunities via direct mail, e-mail, SMS text messaging, telemarketing, pre-recorded messages, or automated attendant telemarketing. These businesses may include providers of direct marketing services and applications, including lookup and reference, data enhancement, suppression and validation and email marketing. For example, if you express interest in a particular product or service, you may be contacted by telephone from Interactive Impact, Inc. or one of its contracted affiliates regarding that particular product or service. The Company collects minimal demographic and personally identifiable information from many users. This information is aggregated and analyzed to help us tailor future offers and to help our marketing partners and advertising agencies understand the demographics of our customers in order to evaluate the potential effectiveness and profitability of doing business with us. Part of our business model involves sharing personally identifiable information, such as name and address, with third-party marketing concerns. While the Company cannot control the practices of our advertisers and third-party marketers, we endeavor at all times to do business with reputable partners who also follow a best practices model regarding your privacy.

All information provided to the Company by the users of this site may be used to support our suppression, validation and enhancement services to other marketing companies, advertising agencies, compilers and data companies.

As an example, opt-out information may be shared with other marketing partners so that those users opting out of further offers are suppressed from the partner's mailings or promotions, as well as our own. In addition to complying with our users' preferences, it simply makes good business sense to mail only to those customers who have indicated a desire to receive such mailings.

The Company's business model includes participating in affiliate network programs and other co-marketing partnerships to promote our site. We reserve the right to share with 3rd parties the information we collect on this site for any purpose.

The Company as a rule will not intentionally disclose personally identifiable information about its users to any third party without first receiving the user's permission. However, the Company may disclose personally identifiable information if required to do so by law, or in the good-faith belief that such action is necessary to (a) conform to edicts of law of comply with legal processes; (b) protect and defend the rights or property of the Company's advertising service, and (c) act under exigent circumstances to protect the personal safety of any user of the Company's advertising service.

WE MAY Sell, Rent or Share Any Identifiable Information provided by you to any 3rd party email list managers, and/email service providers. In addition, if you elect to register to receive daily emails, newsletters, you can expect to receive advertisements which will include third party promotional offer from one of Flagstarequity.com advertising/marketing partners. You also agree by clicking the "OPT IN" at <http://WWW.FLAGSTAREQUITY.COM> you agree to our privacy policy and also further agree to share your information with participating lenders and for them to contact you (including through automated means; e.g. autodialing, text and pre-recorded messaging) via telephone, mobile device (including SMS and MMS) and/or email, even if your telephone number is currently listed on any state, federal or corporate Do Not Call list. You also understand that consent is not a condition of purchase

### **Use of Information**

This Privacy Policy applies to consumers that have signed up on the Flagstarequity.com website, and or have submitted their email address through our affiliate network program and other co-marketing partnerships to promote our site. We may use the personal information that you supply to us and work with other third party businesses to bring selected retail opportunities to our members via direct mail, email, SMS text messaging, and telemarketing. These businesses may include providers of direct marketing services and applications, including lookup and reference, data enhancement, suppression and validation and email marketing.

### **Opt-out rights**

For SMS text messages, you may remove your information by replying "STOP", "END", "QUIT" to the SMS text message you have received and we will remove your personal information within 10 days of receiving such request.

### **SPECIAL OFFER SERVICE SUBSCRIPTION & EXPRESS CONSENT TO RECEIVE MESSAGES.**

By accepting of the terms and conditions of this website (and any associated offers, contests, giveaways or other programs), and providing your telephone number, you are subscribing to a free Special Offer Service ("SOS"). SOS subscribers receive pre-recorded telephone messages regarding various special product offers.

By subscribing, such act constitutes your express written consent to be contacted by Flagstarequity.com via prerecorded telephone message for purposes of the Amended Telemarketing Sales Rule (16 CFR §310 et seq.), and the Electronic Signatures in Global and National Commerce Act (15 USC §96), as amended from time to time. The calls you are agreeing to receive describe goods and services offered by third parties through the SOS, and any goods or services described in the call are not sold by or through Flagstarequity.com.

You are subscribing to receive calls only from Flagstarequity.com, and only at the specific number(s) you have provided to us. Your consent will be effective if the number you have provided is a home, business, or cell phone line, or if the number is registered on any state or federal Do-Not-Call (DNC) list as of the date of this consent. Flagstarequity.com reserves the right to refrain from calling any number registered on a DNC list in connection with any promotions. This consent shall remain in effect until you revoke your consent and cancel your subscription.

To unsubscribe: You may cancel your SOS subscription and revoke your consent to receive calls at any time by either (a) utilizing the opt-out procedure included in any message you receive; (b) by sending an e-mail that includes your telephone number to [optout@Flagstarequity.com](mailto:optout@Flagstarequity.com) (a) or (b) by sending a written request to Flagstarequity.com, 15 Fox Valley Center, Arnold MO 63010. We may take a reasonable period of time to respond to any request to opt out or cancel or modify a subscription. If you request the cancellation or modification of your subscription, such information may be retained for a period of time in our backup systems as a precaution against system failures. Some information may be retained for longer periods as required by law, contract or auditing requirements.

### **Delete/Deactivate Policy**

Users at any time may unsubscribe to our electronic mailings by following the instructions that we include at the end of every mailing. To correct, update or request that we delete information you provided, please contact us via email, or by writing

Flagstar Equity LLC

ATTN: Unsubscribe Department

15 Fox Valley

Arnold, MO 63010

### **Notification Of Changes To Privacy Policy**

From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future we will post these policy changes to our Web site to notify you and provide you with the opportunity to opt out of these new uses. If you are concerned about how your information is used, you should check back at our Web site periodically.

### **General Security Policy**

The Company endeavors at all times to meet and exceed standards of online privacy protection. When you submit information, your information is protected both on-line and off-line in accordance with applicable laws, regulations and industry standards. For example, without limitation, the company uses a Network Administrator, SSL to protect the confidentiality of the information you provide.

For additional information or specific questions, please contact us.