

STAIRS FINANCIAL PRIVACY POLICY

Effective date: September 16, 2024

Future Home Investment Accounts Inc. d/b/a Stairs Financial and its affiliates and subsidiaries (and predecessors in interest, successors and assigns) (“Company” “we,” “our,” and/or “us”) values the privacy of individuals who use our website at www.stairsfinancial.com (“Site”). This privacy policy (the “Privacy Policy”) explains how we collect, use, and share information from individuals who use our Site using a computer, smartphone, tablet or other mobile devices. By using our Site, you agree to the collection, use, disclosure, and procedures described in this Privacy Policy. In addition, this Privacy Policy is part of our [Terms of Use](#), and by using this Site, you agree to the Terms of Use—including to the extent applicable the Arbitration Agreement—as well.

Depending on whether you apply for or obtain a financial product or service, we may also provide you with a Consumer Privacy Notice that explains how we collect, use and share nonpublic personal information that you provide us in connection with the product or service. Our Consumer Privacy Notice offers you certain choices with respect to the use and sharing of your personal information. Please refer to our [Consumer Privacy Notice](#) for more information.

1. INFORMATION WE COLLECT

1.1 Information You Provide to Us

A. Personal Information. If you sign up to use our Site, we may ask you for information about you such as your name, email address, phone number, prospective purchase property location and estimated purchase price, savings, income, credit score, debt payments, household size, profession, first time home buyer status, veteran status. We may also ask if you are working with a real estate agent.

B. Direct Communications. If you contact us directly, we may receive additional information about you. For example, if you contact us for customer support, we may collect your name, email address, phone number, the contents of the message and any attachments you send to us, and any other information you choose to provide.

1.2 Information We Collect When You Use Our Site

A. Location Information. When you use our Site, we may collect your precise location information. We may also infer your general location information by using your internet protocol (IP) address.

B. Device Information. We receive information about the device and software you use to access our Site, such as your IP address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

C. Usage Information. To help us understand how you use our Site and to help us improve it, we automatically receive information about your interactions with our Site, such as the pages or other content you view, the searches you conduct, the purchases you make, your comments, any content you post, and the dates and times of your visits.

D. Information from Cookies and Similar Technologies. We and our service providers may collect information using cookies, web beacons, pixel tags, or similar technologies. Cookies are pieces of information stored directly on a computer or mobile application you are using that allow us to collect technical and navigational information, such as browser type, time spent on a website or mobile application, and pages visited. Cookies also allow us to select which advertisements or offers are most likely to appeal to you and display them to you. We may use cookies in online advertising to track responses and your use of other websites. If you do not accept these cookies, you may experience some inconvenience in your use of some online options. A pixel tag is a graphic image that indicates when you visit a website or download certain content. Other parties may use these and other technologies to collect information about your online activities over time and across different internet websites, online or cloud computing services, online applications, or mobile applications when you use our Site.

2. HOW WE USE THE INFORMATION WE COLLECT

We may use the information we collect:

- To present you with companies that may be able to provide you with mortgage loans or other financial products;
- To provide you with real-estate related offers presented by our business partners or to connect you with real-estate related persons;
- To determine your potential eligibility for home buying programs, including down payment assistance;
- To understand and analyze how you use our Site and develop new products, features, and functionality;
- To communicate with you, provide you with updates and other information, provide information that you request, respond to comments and questions, and provide customer support;
- For marketing and advertising purposes, such as developing and providing promotional and advertising materials;
- To generate aggregated or deidentified data that we may use to improve the Site or our products;
- To facilitate your transactions with us or with third party mortgage lenders;
- To identify and prevent fraud;

- For compliance purposes, including enforcing our Terms of Use or other legal rights; and
- For other purposes for which we provide specific notice at the time the information is collected.

3. HOW WE DISCLOSE THE INFORMATION WE COLLECT

3.1 Lenders. Our Site allows you to search for mortgages and evaluate loan programs, including programs with down payment assistance, and we will share information with lenders who may be able to offer you products and services. We are not responsible for any lender's use of your information.

3.2 Affiliates. We may share any information we receive with our affiliates for any of the purposes described in this Privacy Policy or our Consumer Privacy Notice.

3.3 Real Estate Partners, Vendors, and Service Providers. We may share any information we receive with our real estate partners with your consent and vendors and service providers to assist us in providing you products and services or to maintain the Site.

3.4 As Required by Law and Similar Disclosures. We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect our or others' rights, property, or safety.

3.5 Merger, Sale, or Other Asset Transfers. We may transfer your information to service providers, potential transactional partners, or other third parties in connection with a contemplated or actual transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this Privacy Policy.

3.6 Consent. We may disclose your information with your permission.

4. THIRD PARTIES

Our Site may contain links to other websites that we do not own or operate. We are not responsible for the privacy practices of these third parties. This Privacy Policy does not apply to your activities on these third-party websites or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes without your consent.

5. SECURITY

We care about the security of your information and take reasonable measures designed to protect your personal information by using reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to personal information. This includes device safeguards and secured files and buildings.

Please note that information you send to us electronically may not be secure when it is transmitted to us, and we make no guarantees as to the security or privacy of your information. We recommend that you do not use unsecure channels to communicate sensitive or confidential information (such as your Account Details, Social Security numbers, etc.) to us. If you are visiting the Site, your Internet session should be encrypted if your security-enabled browser is connected using the Secure Hypertext Transport Protocol. URL strings beginning with “HTTPS://” instead of the usual “HTTP://” indicate that the secure protocol is in effect. Your internet browser may also show an icon indicating that the Site is considered secure.

6. CHILDREN

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our Site is marketed to children. If you learn that a child has provided us with personal information, please let us know at legal@stairsfinancial.com. For more information on the Children’s Online Privacy Protection Act, please visit the Federal Trade Commission website at www.ftc.gov.

7. INTERNATIONAL TRANSFERS OF DATA

Our Site is hosted in the United States and intended to be used by individuals located within the United States. If you choose to use the Site from the European Union or other regions of the world with different laws governing data collection and use, you acknowledge that you are transferring your personal information outside of those regions to the United States for storage and processing. We may transfer your data from the United States to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Site. By providing any information, including personal information, on or to the Site, you consent to such transfer, storage, and processing.

8. EMAIL COMMUNICATIONS

You consent to us sending you emails at any email address you provide to us, including marketing-related messages. You may opt out of receiving marketing emails by using the “unsubscribe” function found within the email. Even if you opt out of receiving marketing messages from us, you will continue to receive administrative messages from us. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience.

9. CALL MONITORING

You understand and agree to the recording and monitoring of any telephone call with us or our agents for quality assurance, training, risk management, or any other legitimate purpose.

10. DO NOT TRACK SIGNALS

Certain web browsers may possess a do-not-track feature which allows you to direct your browser to tell websites that you do not want to have your online activities tracked. At this time, the Site does not respond to do-not-track signals.

11. ACCESSING/UPDATING YOUR INFORMATION

If you would like to review and request changes to your personally identifiable information collected by the Site, please let us know at support@stairsfinancial.com.

12. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change our Privacy Policy from time to time. If we make changes to this Privacy Policy, we will post a revised Privacy Policy on this page with a new effective date, and the revised version will be effective when it is posted. We will notify you of any changes to this Privacy Policy as required by law.

13. CONTACT US

If you have any questions, comments, or concerns about the Privacy Policy, please contact us via mail or email at:

Address:

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New York, NY 10016

Email: legal@stairsfinancial.com