

White Rock Asset Solutions

PRIVACY POLICY

Last updated January 2, 2026

IMPORTANT NOTICE REGARDING TEXT MESSAGING DATA

("we," "us," or "our") DOES NOT share customer opt-in information, including phone numbers and consent records, with any affiliates or third parties for marketing, promotional, or any other purposes unrelated to providing our direct services. All text messaging originator opt-in data is kept strictly confidential.

This privacy notice for ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

Visit our website at , or any website of ours that links to this privacy policy

Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at contact@whiterockassetsolutions.com

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

Do we process any sensitive personal information?

We do not process sensitive personal information.

Do we receive any information from third parties?

We do not receive any information from third parties.

How do we process your information?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.

We do not share or disclose your personal information except in very specific, rare circumstances, and always with your consent. For instance, if we ever need to share data due to a business transfer, merger, or acquisition, we will notify you and ensure your privacy is protected.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. Information sharing to subcontractors in support services, such as customer service is permitted. All other use case categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

In what situations and with whom do we share personal information?

We value your privacy and never share your personal information with third parties. Your information remains confidential and is only used for the purpose of providing our services to you.

How do we keep your information safe?

We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe. Your personal information remains private and secure with us at all times.

We do not sell, distribute, or disclose your personal information to mailing lists or other third parties without your explicit consent. If requested, we can add your contact to business-related mailing lists, but you may opt-out at any time. Your personal information is always protected, and we will take appropriate steps to ensure its security.

We will not, in any circumstances, share your personal information with other individuals or organizations without your permission, including public organizations, corporations or individuals, except when applicable by law. We do not sell, communicate or divulge your information to any mailing lists. We can offer to add your address to an Info entrepreneurs or Canada Business Network mailing list or list server if you request it. In this last case, you may at any time ask us to remove your name from such lists. The only

exception is if the law or a court order compels us to. We will share your information with government agencies if they need or request it.

What are your rights?

Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

How do you exercise your rights?

The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect?

Review the privacy notice in full.

1. Information We Collect

We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following

:

Personal Information:

Name, email address, phone number, physical address

Payment information when you make a purchase or request a quote

Opt-in records and timestamps for all communication channels (SMS, email, etc.)

Non-Personal Information:

IP address, browser type, device information

Website usage patterns and preferences

Cookies and similar technologies

Customer Communication:

Records of inquiries and service requests

Appointment details and preferences

Service history and feedback

We process your personal information to deliver our real estate services, including:

Providing and improving our services

Processing transactions and payments

Communicating with you about your inquiries, appointments, and promotions

Enhancing website functionality and user experience

Ensuring security and fraud preventions

Maintaining records of your communication preferences and consent

Property Inquiries & Support:

To respond to your inquiries, schedule viewings, and assist with any real estate-related questions.

Transactions & Contracts:

To help manage the purchase, rental, or sale of properties, including processing contracts, payments, and documentation.

Marketing Communications:

To send you updates about new properties, promotional offers, or real estate market news. You can opt out of marketing communications at any time.

Targeted Advertising:

To show you personalized property recommendations and advertisements based on your preferences and interests.

Legal Compliance:

To ensure compliance with real estate laws and regulations, and to respond to legal requests.

2. How We Use Your Information

We process your information to provide, improve, and administer our services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

3. SMS Messaging & Compliance

Text Message Platform Terms & Conditions

By opting into our SMS messaging services, you agree to receive text messages related to our services, including appointment reminders, customer support, and important updates.

Opt-In Consent:

You will only receive messages if you have explicitly opted in

We maintain timestamped records of all opt-in actions

We comply with the Telephone Consumer Act (TCPA) and all applicable laws

Opt-Out Instructions:

You can cancel SMS notifications at any time by replying "STOP"

You will receive a final confirmation message, and no further messages will be sent unless you re-opt in

All opt-out requests are processed within 24 hours

Message Frequency & Content:

Message frequency varies based on your interactions with our business

Messages will be directly related to the services you have requested

We do not send promotional content without specific consent

Help & Support:

Reply "HELP" for assistance or contact us at contact@whiterockassetsolutions.com

Customer support is available during regular business hours

Carrier Information:

Standard message and data rates may apply

Carriers are not liable for delayed or undelivered messages

Supported carriers include AT&T, T-Mobile, Sprint, Verizon, and most regional carriers

SMS Data Protection Statement

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. Information sharing to subcontractors in support services, such as customer service is permitted. All other use case categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

We implement strict data protection measures to safeguard your SMS opt-in information and consent records.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law. We retain your personal information only as long as necessary to provide our services, fulfill transactions, or comply with legal obligations. Once we no longer need to retain your information, we will securely delete or anonymize it.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your

information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

7. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time.

Withdrawing your consent:

If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications:

You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying "STOP" or "UNSUBSCRIBE" to the SMS messages that we send, or by contacting us using the details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. You will then be removed from the marketing lists.

You can cancel the SMS service at any time. Simply text "STOP" to the shortcode. Upon sending "STOP," we will confirm your unsubscribe status via SMS. Following this confirmation, you will no longer receive SMS messages from us. To rejoin, sign up as you did initially, and we will resume sending SMS messages to you.

Cookies and similar technologies:

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

If you have questions or comments about your privacy rights, you may email us at contact@whiterockassetsolutions.com

8. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

9. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: If you are a resident of California, Colorado or Virginia, you are granted specific rights regarding access to your personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

We will use and retain the collected personal information as needed to provide the Services or for:

Category B - As long as the user has an account with us

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

Receiving help through our customer support channels; Participation in customer surveys or contests; and Facilitation in the delivery of our Services and to respond to your inquiries.

How do we use and share your personal information?

Learn about how we use your personal information in the section, "HOW DO WE PROCESS YOUR INFORMATION?"

California Civil Code Section 1798.83, also known as the "Shine The Light" law permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information

provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

CCPA Privacy Notice

This section applies only to California residents. Under the California Consumer Privacy Act (CCPA), you have the rights listed below.

The California Code of Regulations defines a "residents" as:

(1) every individual who is in the State of California for other than a temporary or transitory purpose and (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

Your rights with respect to your personal data

Right to request deletion of the data — Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed — Request to know

Depending on the circumstances, you have a right to know:

whether we collect and use your personal information;

the categories of personal information that we collect;

the purposes for which the collected personal information is used;

whether we sell or share personal information to third parties;

the categories of personal information that we sold, shared, or disclosed for a business purpose;

the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;

the business or commercial purpose for collecting, selling, or sharing personal information; and the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a *consumer request*.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Right to Limit Use and Disclosure of Sensitive Personal Information

We do not process consumer's sensitive personal information.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights

You may object to the processing of your personal information.

You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.

You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

You may request to opt out from future selling or sharing of your personal information to third parties.

Upon receiving an opt-out request, we will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the date of the request submission.

To exercise these rights, you can contact us by submitting a data subject access request, or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

Colorado Residents

This section applies only to Colorado residents. Under the Colorado Privacy Act (CPA), you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

Right to be informed whether or not we are processing your personal data

Right to access your personal data

Right to correct inaccuracies in your personal data

Right to request deletion of your personal data

Right to obtain a copy of the personal data you previously shared with us

Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

To submit a request to exercise these rights described above, please email

or submit a data subject access request.

If we decline to take action regarding your request and you wish to appeal our decision, please email us at . Within forty-five (45) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Connecticut Residents

This section applies only to Connecticut residents. Under the Connecticut Data Privacy Act (CTDPA), you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

Right to be informed whether or not we are processing your personal data

Right to access your personal data

Right to correct inaccuracies in your personal data

Right to request deletion of your personal data

Right to obtain a copy of the personal data you previously shared with us

Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

To submit a request to exercise these rights described above, please email contact@whiterockassetsolutions.com

or submit a data subject access request.

If we decline to take action regarding your request and you wish to appeal our decision, please email us at

. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Virginia Residents

Under the Virginia Consumer Data Protection Act (VCDPA):

"Consumer" means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

"Personal data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

"Sale of personal data" means the exchange of personal data for monetary consideration.

If this definition of "consumer" applies to you, we must adhere to certain rights and obligations regarding your personal data.

Your rights with respect to your personal data

Right to be informed whether or not we are processing your personal data

Right to access your personal data

Right to correct inaccuracies in your personal data

Right to request deletion of your personal data

Right to obtain a copy of the personal data you previously shared with us

Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Exercise your rights provided under the Virginia VCDPA

You may contact us by email at or submit a data subject access request.

If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

Right to appeal

If we decline to take action regarding your request, we will inform you of our decision and reasoning behind it. If you wish to appeal our decision, please email us at . Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may contact the [Attorney General to submit a complaint](#).

13. Privacy Rights Around the World: What Other Regions Protect

You may have additional rights based on the country you reside in.

Australia and New Zealand

We collect and process your personal information under the obligations and conditions set by Australia's Privacy Act 1988 and New Zealand's Privacy Act 2020 (Privacy Act).

This privacy notice satisfies the notice requirements defined in both Privacy Acts, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information.

If you do not wish to provide the personal information necessary to fulfill their applicable purpose, it may affect our ability to provide our services, in particular:

offer you the products or services that you want

respond to or help with your requests

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?"

If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner and a breach of New Zealand's Privacy Principles to the Office of New Zealand Privacy Commissioner.

Republic of South Africa

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?"

If you are unsatisfied with the manner in which we address any complaint with regard to our processing of personal information, you can contact the office of the regulator, the details of which are:

The Information Regulator (South Africa)

General enquiries: enquiries@inforegulator.org.za

Complaints (complete POPIA/PAIA form 5): PAIAComplaints@inforegulator.org.za & POPIAComplaints@inforegulator.org.za

14. CONTACT US

If you have questions about this Privacy Policy or how your information is handles, contact us at: [\(830\)-309-2686](tel:830-309-2686) or email us at: contact@whiterockassetsolutions.com

By using our website and services, you consent to this privacy policy.