

KAI DATA, LLC/VULCAN7 PRIVACY POLICY

PREFACE

KAI DATA, LLC, is a Data Research Software Company, that provides a Software/Service to its Clients/Licensees/Subscribers. Vulcan7 is one of its Software/Services. The Kai Data/Vulcan7 Software/Service appends certain Contact Information, to Leads, to identify Owners, and potential Sellers and Buyers, referred to as, Contacts, of Real Estate Properties. The Vulcan7 Software/Service also provides other components, to assist the Client/Licensee/Subscriber in reaching their Contacts.

Kai Data, LLC, sometimes hereinafter referred to as, Kai Data, recognizes the importance of maintaining the Privacy of their Clients/Licensees/Subscribers, and the Confidentiality of each Individual's Non-Public Personal Information. Kai Data takes seriously the responsibility that accompanies the collection of Non-Public Personal Information. Accordingly, Kai Data's Policy is to protect the Privacy and Confidentiality of the Clients/Licensees/Subscribers.

In order to conveniently, and effectively, provide the Software/Service, Kai Data may collect, and use, certain Non-Public Personal Information. Kai Data does not rent, sell, or share, the Personally Identifiable Information of their Clients/Licensees/Subscribers, with Non-Affiliated Third Parties. Kai Data may, however, share certain Personally Identifiable Information with Third-Party Contractors/Vendors. In the event that Kai Data provides such Information to Third-Party Contractors/Vendors, the Contractors/Vendors are prohibited from using the Information for purposes, other than performing Services for Kai Data, relative to the Client/Licensee/Subscriber. Also, Kai Data may disclose Information of the Client/Licensee/Subscriber, to Third-Parties, whenever obligated to do so, by Law and/or to Investigate, Prevent, or take action regarding suspected or prohibited activities.

In order to protect the Client's/Licensee's/Subscriber's, Non-Public Personal Information, Kai Data limits access to Non-Public Personal Information, by only allowing Authorized Personnel to have access to such Information. Furthermore, Kai Data maintains Physical, Electronic, and Procedural Security Protections, to safeguard the Non-Public Personal Information in their Records. Kai Data has Security Measures in place to protect the Loss, Misuse, and Alteration of the Information under their control. The Network Infrastructure is located in a controlled access facility, that restricts its access to Authorized

Individuals. The Network Infrastructure is protected by a Firewall, and Traffic is monitored, and Logged, both on the Firewall and Servers. The Administrative Activities are carried out, over Secure, Encrypted Links, between their Offices, and the Hosting Facilities. Administrative access is limited, not only, to Authorized Employees, but is also subject to specific remote Administration Protocols, and Internet Provider (IP) Addresses. All Employees, with access to Personally Identifiable Information, of the Client/Licensee/Subscriber, have been advised of Kai Data's Security Policies and Practices. Kai Data conducts Internal Audits of its Security Systems, and makes all necessary enhancements, to ensure the safety of the Website and its Users.

SECTION ONE

REGISTRATION OF THE CLIENT/LICENSEE/SUBSCRIBER

In order to use the Kai Data/Vulcan7 Software/Service, a Client/Licensee/Subscriber must first complete the Registration Form. The Client/Licensee/Subscriber is required to provide certain Contact Information. Kai Data uses that Information, in order to contact the Client/Licensee/Subscriber, about the Software/Service. The Client/Licensee/Subscriber may also be asked for certain Demographic Information, in order that Kai Data will be able to provide more effective Services. Also, a Client/Licensee/Subscriber will be required to submit certain Financial Information, such as a Credit Card Number, and an Expiration Date. This Information is used only for Billing Purposes.

SECTION TWO

INFORMATION COLLECTION AND USE

(A)

INFORMATION CLIENT/LICENSEE/SUBSCRIBER PROVIDES TO

KAI DATA, LLC/VULCAN7

Personal Data about Client/Licensee/Subscriber may be collected when Client/Licensee/Subscriber registers for our service, contact our customer service representatives, sends us an email, integrate with another service or website, or communicate with us in any way.

KAI DATA, LLC/VULCAN7 acts as the controller of Personal Data about Client/Licensee/Subscriber provided to us by Members in order to provide the System to them as well as Personal Data that we may collect about visitors to our site. We also act as the processors of Personal Data about Client/Licensee/Subscriber, which is stored and processed by and on behalf of our Client/Licensee/Subscriber. We only process Personal Data where such processing is in our legitimate interests and not overridden by Client/Licensee/Subscriber data protection interests or fundamental rights and freedoms. Our legitimate interests typically include: improving, maintaining, providing, and enhancing our technology, products, and System, ensuring the security of the System, and to support our marketing activities.

(B)

**INFORMATION KAI DATA, LLC/VULCAN7 PROCESSES
ON BEHALF OF CLIENT/LICENSEE/SUBSCRIBER**

As a Client/Licensee/Subscriber, we will use Personal Data that we gather about Client/Licensee/Subscriber to provide the requested services. In addition, if you have a free trial account, then we will use the Personal Data gathered about Client/Licensee/Subscriber to share more information about our business in an attempt to convince Client/Licensee/Subscriber to make a purchase from us or our associated companies. If Client/Licensee/Subscriber have a paid account, we will use Client/Licensee/Subscriber Personal Data to bill and collect money owed to us by Client/Licensee/Subscriber.

As a Client/Licensee/Subscriber, this site and the person/affiliate who sent you to this site will be granted access to your contact information (name, phone number, and email) so that they can communicate with you in an attempt to "sell" various products, services, and memberships to you.

KAI DATA, LLC/VULCAN7 may also use Client/Licensee/Subscriber Personal Data to send system alert messages, communicate about your account and provide customer support, enforce compliance with ours Terms and Conditions of Service, to protect the rights and safety of our Client/Licensee/Subscribers and third parties, to meet legal requirements, and to otherwise carry out legitimate business purposes necessary to operate the System.

(C)

PROFILE OF THE CLIENT/LICENSEE/SUBSCRIBER

Kai Data stores the Information, which they collect, through Cookies, Log Files, Clear GIFS, and/or Third Parties, to create a Profile of the Client/Licensee/Subscriber. A Profile is stored Information that Kai Data keeps, relative to the Individual Client/Licensee/Subscriber.

SECTION THREE

(A)

COOKIES

A Cookie is a piece of Data, which is stored on the User's Computer, which includes all Computing Devices, including Tablets, Personal Computer Systems, Smart Phones, Smart Watches, and any other Device that may be used to operate the Software/Service, which is provided to the Client/Licensee/Subscriber. Kai Data uses both Session ID Cookies and Persistent Cookies. Relative to the Session ID Cookie, once a Client/Licensee/Subscriber, closes the Browser, the Cookie simply terminates. A Persistent Cookie is a small Text File, which is stored on the Client/Licensee/Subscriber's Hard Drive, for an extended period of time. Persistent Cookies can be removed by following the Internet Browser Help File Directions.

If a Client/Licensee/Subscriber rejects the Cookie, they may still use the Software/Service; the only disadvantage, in this regard, is that the User will be limited, in some areas of Kai Data's WebSite. Persistent Cookies enable Kai Data to Track, and Target, the Interests of the Client/Licensee/Subscriber, in order to enhance the Software/Service.

(B)

LOG FILES

Kai Data also uses Log Files. Log Files include Internet Provider (IP) Addresses, Browser Type, Internet Service Provider (ISP), referring/Exit Pages, Platform Type, Date/Time Stamp, and Number of Clicks, to Analyze Trends, Administer the Site, and Track the Client/Licensee/Subscriber's Movements, in the Aggregate, and to gather Broad

Demographic Information for Aggregate Use. Internet Provider (IP) Addresses are only tied to Personally Identifiable Information, which is provided by the Client/Licensee/Subscriber.

(C)

CLEAR GIFS

Kai Data may also Employ, or their Third-Party Advertising Company/Companies, may Employ a Software Technology, referred to as, Clear GIFS, which Clear GIFS are also known as Web Beacons/Web Bugs, which help Kai Data to better manage the Content, on their Site, by informing them, relative to what Content is effective. Clear GIFS are tiny Graphics, with a unique Identifier, similar, in function, to Cookies, and are used to Track the Online Movements of Web Users. The main difference between Cookies, and a Clear Gift, is that a Clear Gift is invisible, on the Page, and is much smaller, about the size of the Period at the end of this sentence. Clear GIFS are tied to the Client/Licensee/Subscriber's Personally Identifiable Information. Clear GIFS can also "work with" existing Cookies on a Computer, if they are both from the same Website or Advertising Company.

In addition, Kai Data may use Clear GIFS, in their Hyper-Technical Mark-Up Language (HTML), based Electronic Mail Transmissions, in order to allow them to determine which Electronic Mail Transmissions have been opened by the Client/Licensee/Subscriber. This Protocol allows Kai Data to gauge the effectiveness of certain Communications, and the effectiveness of their Software/Service.

CLIENT/LICENSE/SUBSCRIBER CREDIT CARD, SOCIAL SECURITY NUMBER OR EIN, AND OTHER PRIVATE FINANCIAL INFORMATION IS NEVER SHARED WITH ANY OUTSIDE THIRD PARTY UNLESS REQUIRED BY LAW OR FOR BILLING PURPOSES.

SECTION FOUR

RE-TARGETING

Kai Data may also use Third Party Vendor Re-Marketing Tracking Pixels, or Cookies. This concept means that Kai Data may continue to show Advertisements, to the Client/Licensee/Subscriber, across the Internet. The Techniques, which our Affiliated

Companies use, do not collect Personally Identifiable Information, such as the Client/Licensee/Subscriber's Name, Electronic Mail Transmission Address, Postal Address, or Telephone Number.

Kai Data is able to perform this function, by placing Advertising Cookies, on the Client/Licensee/Subscriber's Computer, as they Browse the Kai Data Internet Website, in order that they can determine the Client/Licensee/Subscriber's interest. One of their Advertising Affiliates may then use this Information, to present, to the Client/Licensee/Subscriber, Re-Targeting Advertising, relative to other Sites, based upon the Client/Licensee/Subscriber's previous interaction, with the Kai Data Internet Website. The Client/Licensee/Subscriber may "opt out" of Targeted Advertising, through their Browser's "Settings" Tab, or by visiting the Sites of the various Re-Marketing Vendors.

SECTION FIVE

ADDITIONAL LIMITS ON USE OF USER'S GOOGLE DATA

Notwithstanding anything else in this Policy, if Clients/Licensees/Subscribers provide Kai Data access to the following types of Clients/Licensees/Subscribers Google data, Kai Data's use of that data will be subject to these additional restrictions: Kai Data will only use access to read, write, modify, or control Gmail message bodies (including attachments), metadata, headers, and settings to provide a web email client that allows Clients/Licensees/Subscribers to compose, send, read, and process emails and will not transfer this Gmail data to others unless doing so is necessary to provide and improve these features, comply with applicable law, or as part of a merger, acquisition, or sale of assets. Kai Data will not use Clients/Licensees/Subscribers' Gmail data for serving advertisements. We will not allow humans to read this data unless Kai Data has Clients/Licensees/Subscribers' affirmative agreement for specific messages, doing so is necessary for security purposes such as investigating abuse, to comply with applicable law, or for the System's internal operations and even then only when the data has been aggregated and anonymized.

SECTION SIX

SHARING WITH THIRD PARTIES AGGREGATE INFORMATION

(NON-PERSONALLY IDENTIFIABLE INFORMATION)

Kai Data may share Aggregated Demographic Information, with their Affiliated Companies, and their Vendors, and Advertisers excluding any Client/Licensee/Subscriber's Gmail Data which will never be shared. This Information is not linked to any Personally Identifiable Information of the Client/Licensee/Subscriber.

SECTION SEVEN

THIRD-PARTY ADVERTISERS

Kai Data may use the Personal Contact Information, which was provided to them, in order to cause Information, Offers, Products, and/or other Services, which may appear, to Kai Data, to be consistent with the Client/Licensee/Subscriber's expressed interest. This Process is typically accomplished, by using the Client/Licensee/Subscriber's Information to direct, to them, Information, Offers, Products and/or Services, from Kai Data and/or one of their Affiliated Companies.

SECTION EIGHT

THIRD-PARTY INTERMEDIARIES

Kai Data may use a Credit Card Processing Company, to Bill the Client/Licensee/Subscribers, for their Services. These Credit Card Processing Companies only use the Client/Licensee/Subscriber's Information, for Billing Purposes, and, to the extent that they store the Client/Licensee/Subscriber's Credit Card and/or other Private Financial Information, they do so in a Secure Industry-Standard Fashion.

SECTION NINE

SERVICE PROVIDERS

Kai Data may associate with Third Parties, in order to provide specific Services. When the Client/Licensee/Subscriber Subscribes for the Kai Data/Vulcan7 Software/Service, Kai Data may share the Name, and other Contact Information, which may

be necessary, in order for the Third Party/Service Provider, to be able to provide certain Services. These Third Parties/Service Providers are not allowed to use the Client/Licensee/Subscriber's Personally Identifiable Information, except for the purpose of providing the Services, which are requested by the Client/Licensee/Subscriber.

SECTION TEN

BUSINESS TRANSITION

In the event the Kai Data enters into a significant Business Transition, such as a Merger, being acquired by another Company, or Selling a major portion of its Assets, the Personally Identifiable Information, of the Client/Licensee/Subscriber will, in most instances, be a part of the Assets, which are transferred. Kai Data will notify the Client/Licensee/Subscriber, by Electronic Mail Transmission, prior to the change of Ownership, or control of their Personally Identifiable Information.

SECTION ELEVEN

LEGAL PROCEEDINGS

Kai Data may be required, by Law, to disclose Personally Identifiable Information, of the Client/Licensee/Subscriber, to the Government and/or Third-Parties, under certain circumstances. In that regard, the Client/Licensee/Subscriber does hereby authorize Kai Data, to disclose such Information, about them, to Law Enforcement or other Government Officials, as Kai Data, in their sole discretion, deemed to be necessary or appropriate.

SECTION TWELVE

CHOICE / OPT-OUT

Relative to the Choice/Opt Out Concept, the Client/Licensee/Subscriber, who no longer wishes to receive Kai Data's Communications, may "Opt-Out," of receiving such Communications, by following the Un-Subscribe Instructions, which are sent with every Electronic Mail Transmission. Also, the Client/Licensee/Subscriber, who wishes to remove Cookies, may do so, by following the Directions, provided in the Internet Browsers 'Help'

Tab. If the Client/Licensee/Subscriber rejects Cookies, the Client/Licensee/Subscriber may still use the Kai Data Internet Website; however, the ability of the Client/Licensee/Subscriber to use some aspects of the Website may be limited.

SECTION THIRTEEN

CHILDREN'S PRIVACY

Relative to the concept of the Privacy of Children, which, for the purpose of this Section, pertains to Individuals, who are under the age of Sixteen (16). The concept of protecting Children's Privacy is very important to Kai Data. As such, if a Client/Licensee/Subscriber is not Sixteen (16) years of age, or older, such Individual is not permitted to access the Kai Data Internet Website, for any reason. Kai Data does not, knowingly, collect, or maintain Information, at their site, from those Individuals, who they know, are under the age of Sixteen (16), and, further, no aspect of the Kai Data Internet Website is structured to attract anyone, under the age of Sixteen (16).

SECTION FOURTEEN

TELECOMMUNICATION PRIVACY

Relative to Telecommunication Privacy, protecting the Privacy of the Client/Licensee/Subscriber's Telecommunication Information is very important to Kai Data. When the Client/Licensee/Subscriber makes Phone Calls to, or from, Telecommunication Services, which are provided by Kai Data, Kai Data may track such Information, relative to the Name, Phone Number, and other Information, in regard to the Call. Kai Data does not share this Information, unless required to do so by Law. Also, Kai Data may use this Information, in the Aggregate, to Analyze Trends, or to improve their Service. Relative to the concept of Telecommunication Privacy, the General Rule is that, if the Client/Licensee/Subscriber contacts Kai Data, by Telephone, then, in that event, Kai Data is allowed to contact the Client/Licensee/Subscriber, even if their Telephone Number is listed in the Legal Do Not Call (DNC) List.

SECTION FIFTEEN
CONTACT INFORMATION

In the event that the Client/Licensee/Subscriber, or anyone, has a question, or suggestion, relative to the Kai Data, LLC/Vulcan7 Privacy Policy, please contact us Kai Data, LLC, at the following Addresses, to-wit: support@vulcan7.com or www.Vulcan7.com.

Respectfully Submitted,

KAI DATA, LLC/VULCAN7