# PRIVACY POLICY

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■ **Translated document**
This is a courtesy translation of the official Spanish document. The Spanish version is the legally binding document; this translation is provided for informational purposes only to facilitate understanding.

## INTRODUCTION

At **PORTA REAL**, protecting your privacy and your personal data is a priority. We want you to have clarity about what information we collect, what we use it for, who we share it with, and how we protect it.

In this Policy we explain what personal data is, who is the controller responsible for its processing, what data we collect depending on how you use the platform, what rights you have over your information, how you can exercise them, and our contact channels for any inquiry or request. This Policy is governed by Ley N.° 8968, Ley de Protección de la Persona frente al Tratamiento de sus Datos Personales (Costa Rica's data-protection law), and its regulations.

## I. WHAT IS PERSONAL DATA?

We mean any information that could be used to identify you, whether directly or indirectly: for example, your name, your email address, your phone number, your IP address, or a combination of data that, taken together, makes it possible to know who you are.

## II. WHO IS THE DATA CONTROLLER?

The Controller responsible for collecting, managing, and determining the purpose of the personal data you share when using our site is:

**3-102-939791 SOCIEDAD DE RESPONSABILIDAD LIMITADA**

Cédula Jurídica (corporate ID): 3-102-939791

Registered Office: Condominio Blue, Casa 21, Residencial Los Arcos, Heredia, Costa Rica

3-102-939791 Sociedad de Responsabilidad Limitada (hereinafter, "PORTA REAL"), registered with the Registro Nacional de Costa Rica under Tomo 2025, Asiento 571526, makes available to internet users the platform hosted on this website, as well as the contents contained therein. **PORTA REAL®** is a service mark registered under Registro N.° 414509 with the Registro de la Propiedad Intelectual, and is the commercial identity under which we operate.

The personal data you provide, or that is generated through the use of the platform, is incorporated into PORTA REAL's database of users and visitors, for which this company is the controller.

## III. WHAT DATA DO WE COLLECT?

To fulfill the purposes described in this Policy, PORTA REAL, in its capacity as Data Controller (except in the cases of section III.b.2 where otherwise indicated), will collect the following personal data through the forms, messaging, and other means enabled on this website, in its mobile application when available, and on its official social media profiles:

### a. If you are a registered user

We collect:

- **Identification and contact**: first name, last name, email address, phone and WhatsApp number, profile photo, address (province, canton, district), which are used to create and manage your account, as well as to send you communications related to the service.
- **Identity document number (cédula de identidad, migration identity document, NITE, or cédula jurídica)**: it is requested from you in order to publish listings and is collected **exclusively for the purposes of identifying the advertiser and, where applicable, verifying identity**. We do not use it for any other purpose.
- **Agency identification data**: the identification information the Agency must provide to PORTA REAL during the onboarding process under the Terms and Conditions (section 13.1), including, in the case of legal persons, the corporate name, the cédula jurídica, the domicile, and the name and identification of the legal representative.
- **Card payment information** (when card payment is enabled): the card number, expiration date, security code, and cardholder name will be captured and processed directly by **TILOPAY SOLUCIONES COMERCIALES LTDA**, cédula jurídica **3-102-833000**, an external payment gateway. PORTA REAL does not collect, does not store, and does not have access to that data; it only receives from the gateway the confirmation of the payment's outcome and the minimum reference data for the transaction.
- **Manual payment data** when you choose to pay by SINPE Móvil or bank transfer: the phone number or account you send the money from, the reference code for the charge, any note you add, and the proof of payment you voluntarily attach, verified directly by PORTA REAL without the involvement of a payment gateway. PORTA REAL uses this data to verify the payment and retains it to comply with its accounting and tax obligations.
- **Data from your real estate publication**: location, price, characteristics, contact information you authorize to be displayed, as well as the documents, videos, and images attached to your publication, including those imported via URL or external file, over which you declare ownership or authorization. Publications with public visibility can be seen by any visitor to the Platform, including people without an account, and are distributed to search engines, artificial intelligence assistants, and social platforms under the Terms and Conditions (sections 7.1 and 16.4); those third parties process publicly accessible content under their own policies. Avoid including identifiable people in the images without their authorization, as well as visible documents or personal information.

- **Background checks for agents and agencies**: this service **is not active at this time**; when it is enabled, it will be governed by a specific policy that we will inform you of before any processing.
- **Reviews and ratings of agents**: when this feature becomes available, we will collect the reviews and ratings you publish and those you receive. This content will be visible to other users and will form part of the public profile of the agent being rated.
- **Real estate preferences and interests**: favorites, collections, search alerts, and private notes.
- **Participation in Demand Cohorts (voluntary)**: if you expressly activate this option (off by default and revocable at any time), your search alert is included anonymously in groupings that Network professionals can consult. If a professional expresses interest in a grouping that matches your search, you will receive a notification within the Platform (and by email, if you have those notifications enabled); the professional will not learn your identity unless you decide to contact them. See the details in section IV.
- **Search history**: including intelligent natural-language search (see section V, which identifies the artificial intelligence provider and what is transmitted to it; we recommend not including sensitive data in your queries).
- **Customer support information** and communications with our support team.
- **Internal messaging between users**: the messages and attached files you exchange within the platform (no end-to-end encryption; avoid sharing sensitive data).
- **Visit requests and messages to an advertiser**: if you decide to request a visit to a property or to send your first message to an agent about a listing they manage, the app informs you, before you send it, that the agent will or may register you as a client in their CRM. When you send the request or the message, the professional will be able to see your name and the contact details you have chosen to display on your profile, and to register you as a client in their CRM to follow up on your request or inquiry (section III.b.2). The use the professional makes of that data to follow up with you is the professional's responsibility, as an independent controller (sections IV and VI), and you may exercise your rights of access, rectification, and erasure before the professional.
- **Campaign-origin data**: if you reach the platform from an ad or from a campaign link, and only if you accept the Performance category in the cookie preference center, we record in your browser the campaign parameters included in the link (for example, the source, medium, campaign, ad, or keyword), the click identifiers that advertising platforms add (for example, Google's gclid, TikTok's ttclid, Meta's fbclid, or Microsoft's msclkid), the page through which you arrived, and the date, for both your first visit attributed to a campaign and the most recent one. Each attributed visit is kept in your browser for at most 90 days, and this data is deleted from it if you withdraw your consent. If you complete your registration on the platform, we include this data in the registration event we measure with PostHog (section V), to measure the results of our campaigns (section IV). In the future we plan to also associate this data with your account and, where applicable, with the conversation you start with an advertiser or with

the subscription you activate; that association is not yet active and, once it is, this data will be retained while the account exists.

- **Connection and platform usage data**: information generated automatically while you browse, such as the time of access, the time spent on the site, the sections visited, the actions taken, and unique session identifiers. This data allows us to analyze how the platform works and to improve the user experience. It comes from our servers' logs and, only if you accept the Performance category in the cookie preference center, from the analytics tools in section V; without that acceptance we do not measure your time spent on the site or your path through it.
- **Technical browsing data**: your IP address and the information about your browser and device that is recorded automatically when you use the platform.
- **Account changes**: a record of the relevant changes made to your account, such as role changes, blocking, or deletion. This record may be retained even after you delete your account, for audit and fraud-prevention purposes, for the period indicated in section IX.
- **Other information you provide to us voluntarily**: any additional data you decide to share with us, for example, when filling out forms, telling us whether a help article was useful to you, or writing to our support team. We recommend not sharing sensitive information unless it is strictly necessary for the service you request.

**b. If you use the professional layer (Red Porta, CRM, and document custody)**

If you activate the platform's professional features, meaning the **Porta Agent Network** (the "Red Porta" or "the Network"), the CRM, and document custody, we additionally process the information described below.

**b.1 Information about you as a professional**

With respect to the following information, PORTA REAL is the data controller:

- **Commission terms**: the shared-commission conditions you publish on your listings (whether you share commission, percentage, conditions, type of agreement, and attribution window). These terms are confidential among Network members and are never public.
- **Alliance records**: the requests, acceptances, and terminations of alliances between professionals. The existence of an alliance is private: who works with whom is never shown publicly.
- **Collaboration records**: the terms fixed at the moment of acceptance, the collaboration's events, and the sharing links you generate.
- **Document custody records**: the digital fingerprint (SHA-256) of each document that you or the other party to a professional relationship uploads to custody, both parties' confirmations, and the access log. The content of those documents is processed as indicated in section III.b.2.

**b.2 Third-party information processed in these features**

When using the professional layer, you will have access to other people's data or will incorporate their data into the Platform. In each case, we indicate who the data controller is:

- **Record of referred buyers (pseudonymized)**: when a buyer contacts a listing through a collaboration link, PORTA REAL records that contact as controller, with the acceptance the buyer gives by sending their first message after seeing the notice "Your contact is recorded as referred by {agent}, who may also add you as a client in their CRM" (text shown in the app). The record is pseudonymous (for example, "Buyer #3"): to the listing owner the contact is shown only in that form, and the record does not reveal the buyer's identity to either of the two professionals. The collaborating professional with whom the buyer converses knows the buyer's identity from the conversation itself and, as the notice states, may register the buyer as a client in their CRM.

- **Appointments, visits, and first messages**: when a buyer decides to request a visit or to send their first message about a listing the professional manages, the app informs them, before they send it, that they will be registered as a client in the professional's CRM ("When the visit is confirmed, the agent will register you as a client in their CRM" or "When you send your message, the agent may register you as a client in their CRM to follow up on your inquiry", texts shown in the app). With the acceptance the person gives by sending the message or the request after seeing that notice, they become linked as a client in the professional's CRM: when they send their first message or, in the case of visits, when the professional confirms the visit (Terms and Conditions, section 12.5); if the professional already had them registered as a client, the link is established from the request. PORTA REAL lets the professional see that person's name and the contact details they have chosen to display on their profile, without copying them into the CRM. PORTA REAL retains the status of controller with respect to that contact data, which the person can update or delete from their account.

- **CRM client data**: with respect to the data of clients and prospects that the professional or the Agency registers in the CRM, the professional or the Agency is the data controller and PORTA REAL acts solely as a processor, limited to the storage and status management of that information, under the Terms and Conditions (section 12.3). The professional or the Agency declares and warrants that it obtained that data lawfully and holds the consent of the data subjects under Ley N.° 8968 and its regulations, unless one of the exceptions provided for in that law applies. When the client is a user of the Platform linked to the CRM (for example, through a visit, a first message, or a conversation with the professional), the CRM does not duplicate their data: it shows their name and the data that person chose to display on their profile, and with respect to that data PORTA REAL retains the status of controller. The stages, notes, and tasks of the sales pipeline are not shown to the client within the Platform; nevertheless, they constitute personal data of the client, who may exercise their rights of access, rectification, and erasure before the professional or the Agency.

- **Documents in custody**: the documents you upload may contain personal data of the parties or of third parties. You decide to incorporate them and warrant that you are authorized to include that data; PORTA REAL acts as processor with respect to the content, which it holds

in custody without verifying its authenticity or reviewing it. Access is limited to the two parties to the relationship, and every access is logged.

- **Demand Cohorts**: as a Network member, you can consult anonymous groupings of search alerts from buyers who chose to participate. Cohorts show only aggregated ranges by area and characteristics, and are shown only when they group at least five (5) buyers. You never receive the identity or the contact details of those buyers.

**c. Operational server logs**

For operational, security, and abuse-prevention reasons, our servers record the following. These logs are generated because they are strictly necessary for the security of the platform and the prevention of fraud and abuse, in compliance with the security duty imposed by article 10 of Ley 8968; they are not used to profile you or for commercial purposes:

- **Searches**: every search executed on the platform is logged with the IP address, the browser's user agent, the filters applied, and, if a session is active, the account that performed it. This also applies to visitors without an account.
- **Listing reports**: when you report a publication, we record the reason, the details you write, your IP address, and, if you have an active session, your account, in order to manage moderation.
- **Listing view and contact metrics**: collected only in aggregate form, without identity; the IP address is used transiently (with a deduplication mechanism of at most one hour) and is not stored associated with the metric.

**d. If you are a visitor**

We collect device and browser information, IP address, connection and platform usage data, search history (see section V, which identifies the artificial intelligence provider and what is transmitted to it; we recommend not including sensitive data in your queries), and interaction with the website. If you arrive from an ad or from a campaign link, and only if you accept the Performance category in the cookie preference center, we also record the campaign-origin data described in section III.a. Some of this data is collected through cookies and through the analytics tools identified in section V and, only if you accept the Marketing category, through the tags of the advertising platforms identified in section VI; when the map loads, Google also receives the data indicated in section VI. Please review our Cookie Policy. The maximum retention period is 2 years from the date of the last visit; PORTA REAL undertakes to apply it also to the analytics events recorded in PostHog (section IX).

**e. Data of persons who are not users**

In some cases we process personal data of persons who do not have a Porta account:

- **Email invitations**: when an agency invites an agent, or when a user shares a property collection, the invitation is sent to an email address that may not belong to any Porta account, at the request of the inviting agency or person. Whoever sends the invitation is responsible for having obtained that address lawfully and declares that they have the data subject's consent to provide it to PORTA REAL (Terms and Conditions, sections 13.3 and 15). PORTA REAL uses that address solely to deliver the invitation and manage its acceptance or

expiration (agency invitations expire after seven (7) calendar days if not accepted); it does not add it to marketing lists or use it for any other purpose. If an agency invitation expires without being accepted, PORTA REAL undertakes to delete that address within the six (6) months following its expiration; other invitation records are retained within the maximum period indicated in section IX.

- **Manual CRM clients**: described in section III.b.2: data provided by the agent under their own warranties of lawfulness.
- **Third-party contact details in imported content**: the documents or URLs a user imports to create a publication may contain third-party contact details; the person importing declares that they hold authorization over that content.

If you are not a Porta user and believe we process data about you, write to us at **soporte@porta.cr**. We will handle your request directly with respect to the data PORTA REAL holds under its responsibility (for example, the record of an invitation you received). When your data was registered by an agent or agency in their CRM, PORTA REAL acts solely as a processor: we will forward your request to the agent or agency acting as controller within three (3) business days, inform you that we have done so, and cooperate with whatever technically depends on the platform. In any case, if you believe your rights have not been addressed, you may turn to the Agencia de Protección de Datos de los Habitantes.

**f. Mandatory or optional nature of the data and consequences of not providing it**

Of the data described in this section, only the data strictly necessary for the feature you request is **mandatory** to provide, identified as required in the corresponding form: for example, the account registration data, the minimum listing information required by section 6.1 of the Terms and Conditions, the identity document number required to publish listings, or the data for the chosen payment method. The consequence of not providing it is that it will not be possible to complete the corresponding action (creating the account, publishing the listing, or processing the payment, as the case may be); there is no other consequence.

All other data is **optional**: declining to provide it does not prevent you from using the platform, although it may limit the specific feature that depends on it (for example, the profile photo, search alerts, or the visibility of your phone number).

## IV. HOW DO WE USE THE DATA WE COLLECT?

We process your personal data to:

- **Offer and operate the PORTA REAL platform**: create your account, manage your profile, process payments, publish and search for properties, facilitate communication between users, send messages and notifications, provide support, manage reviews when available, and operate the **Porta Agent Network ("Red Porta")**: alliances, collaborations, commission terms, document custody, CRM, and demand cohorts.
- **Ensure security and prevent fraud**: verify identity, detect fraudulent activity (including, in the referral program, cross-checking phone numbers between accounts to detect self-

referrals and abuse), manage reports, maintain audit logs, and, when the service is active, carry out background checks.

- **Maintain records for proof and evidence**: in the professional features (collaborations, alliances, and document custody), PORTA REAL records the agreements, their fixed terms, and the relevant events as evidence for the parties. PORTA REAL is not a party to those agreements and does not intervene in disputes between users; each party may request the evidence records to which it is a party.
- **Develop and improve the platform**: usage analysis, improvement of our features, including AI-assisted ones, and training of our support team.
- **Measure the results of our advertising campaigns**: learn which ads and campaigns attract new users, through the campaign-origin data and the usage analytics described in sections III and V, and verify the results that underpin our commercial agreement with the agency that manages our campaigns, to which we deliver only aggregated results. Only if you accept the Marketing category in the cookie preference center do we also disclose to the advertising platforms identified in section VI the conversion events of your visit, which those platforms also use for their own purposes.
- **Comply with legal obligations** under Ley 8968 and other applicable law, handle the exercise of the rights described in section VIII, respond to requests from competent authorities when Costa Rican law so requires, and retain the records necessary to demonstrate compliance with our legal obligations.
- **Carry out communications and marketing**, only when you have given us your consent, to send you communications about news, new features, and promotions of the platform (see section VII).

The following purposes are necessary for providing the service: offering and operating the platform, ensuring security and preventing fraud, maintaining records for proof and evidence, developing and improving the platform with the information the service itself generates, and complying with legal obligations. The following are optional, and depend on a specific decision of yours: usage analytics and campaign measurement through the tools subject to the cookie preference center, the disclosure of data to advertising platforms (section VI), marketing communications, participation in Demand Cohorts, registration as a referred buyer, and the disclosure of your data to a professional when you request a visit or send them a first message.

**Demand cohorts: how the processing works**

If you activate participation in demand cohorts (an option that is off by default):

- Your search alert is added to an anonymous demand grid. Each cell of the grid groups at least **5 people**; counts are shown only as ranges, never exact figures, and there is no function to look up who makes up a cell.
- A professional can express interest in a **cell** (an area and type of search), never in a person. **Professionals never receive your identity or your contact details** through this feature.

- When there is interest in a cell that matches your alert, **it is Porta that notifies you**, within the application. Only if you have enabled email notifications might the notification also reach you through that channel.
- You can mute a specific professional so as not to receive further notifications originated by them, and you can revoke your participation at any time; the revocation is honored at delivery time, so you will not receive notifications after it.

**Artificial intelligence: what it does and what it does not do**

Some features use a third party's artificial intelligence models (see section V): natural-language search, assisted description generation, and assisted listing import.

**PORTA REAL does not use your content or your personal data to train artificial intelligence models of its own, and contracts its AI features under conditions pursuant to which the provider does not use them to train its models.** The "platform improvement" purpose described above covers analyzing how these features perform in order to improve the service, but does not include training models on your content. Keep in mind that the content you publish with public visibility is distributed to search engines, artificial intelligence assistants, and social platforms as part of the distribution service (Terms and Conditions, section 7.1), and those third parties process it under their own policies, which may include training models on publicly accessible content. If our own use were to change in the future, we would update this Policy and ask for your prior consent.

**Agents and agencies as independent controllers**

When you decide to share your data with selling agents or real estate agencies (for example, when contacting a listing or requesting a visit), they will act as Independent Data Controllers, governed by their own policies, under the terms of sections III.b.2 and VI. We recommend reviewing those policies before sharing your data.

**Public visibility of your profile and your listings**

When you publish a listing or maintain a public profile, the information you choose to display becomes publicly accessible on the internet: your name and your identity as a seller, agent, or agency, your photograph, the contact information you authorize to be shown, and your listings' data (location, price, characteristics, photographs, and videos). As part of the distribution service you accept when publishing, that information is also delivered to search engines, assistants and artificial intelligence systems, and social platforms, as described in the Terms and Conditions (sections 7.1, on public distribution, and 16.4, on the license you grant). You can adjust what is displayed with the controls described in section VIII: the "Public profile" switch (available for accounts without published listings or visible closed transactions) and the visibility switches for your phone number and the WhatsApp button.

## V. DISCLOSURE OF PERSONAL DATA TO PROVIDERS (DATA PROCESSORS)

PORTA REAL, in its capacity as Data Controller, is the main recipient of your personal data and may disclose it to service providers that provide it with technical and operational support. These providers act as data processors or as technology intermediaries: they process the data on behalf of PORTA REAL, following its instructions and only to provide it with the contracted service. The cases in which

a third party receives data to use it for its own purposes, including Google's maps service, are not a disclosure to a processor but a transfer, and are described separately in section VI. The providers are:

- **Amazon Web Services (AWS):** cloud infrastructure, database, file and image storage (S3), email delivery (SES), search engine (OpenSearch), and content delivery network (CloudFront). It also acts as a sub-processor for the storage of the CRM data described in section III.b.2.
- **AWS Bedrock (Anthropic Claude models):** artificial intelligence service used for three features: (1) natural-language search: the free text you type or dictate is transmitted to this provider to convert it into search filters; (2) assisted description generation: your property's data and the text you provide are transmitted to generate a draft that you review before applying; and (3) assisted listing import: the URLs you indicate and the files you upload (documents and images; images are read multimodally) are transmitted to extract the property's data.
- **Auth0 (Okta):** authentication and digital identity provider. It manages sign-in and the security of your account. Technical sign-in data may also be used by Auth0 for the security and fraud prevention of its own service, under its privacy policy (auth0.com/privacy).
- **Mux:** video streaming service used to play the videos on some pages of the platform (for example, the page for agents). To deliver the video to you, Mux receives your IP address and technical data about your browser. PORTA REAL does not use Mux's playback statistics, and Mux does not set cookies in your browser.
- **Google Analytics 4:** site usage analytics. It is only activated if you accept the Performance category in the cookie preference center. If you also accept the Marketing category, Google also uses this data for its own advertising purposes, as indicated in section VI.
- **PostHog:** usage analytics for the platform and relay of conversion events to the advertising platforms. It is only activated if you accept the Performance category in the cookie preference center: without that acceptance it is not initialized, and if you withdraw your consent it stops operating and the data it kept in your browser is deleted. PostHog receives the pages you visit, the page you came from, and how you navigate through them; technical data about your device, browser, and connection (such as the device type, operating system, language, IP address, or your browser's user agent); the campaign parameters and click identifiers you arrived with (section III.a); the key events of your registration on the platform (for example, clicks on the buttons that lead to registration and the completion of registration, together with the campaign page through which you arrived and whether you register to search for or to list properties); the Meta and TikTok identifiers associated with your browser or with a click on an ad from those platforms, when they exist (the browser identifiers, Meta's _fbp cookie and TikTok's _ttp cookie, exist only if you accepted the Marketing category); and whether or not you accepted the Marketing category. When you complete your registration, the events from that browser are associated with your account identifier until you sign out; PostHog does not receive your name, your email address, or your phone number. Only the events of people who accepted the Marketing category may be relayed to Google, to TikTok and to Meta, which receive them for their own purposes as described in section VI. Session recording,

surveys, and heatmaps are disabled. PostHog processes the data in its United States cloud (PostHog Cloud US).

- **Sentry:** technical error monitoring. When an error occurs, a technical report is sent that does not include data that directly identifies you, such as your name or your email address, but it may include the path of the page where the error occurred and technical data about your browser. Performance measurement is only activated if you accept the Performance category in the cookie preference center.

For features that are not yet active, PORTA REAL will also rely on the following providers, which will only receive data once those features are enabled:

- **Tilopay:** when card payment is enabled, it will be the provider in charge of the secure processing of your card transactions and payment data. Payments by SINPE Móvil or bank transfer are not disclosed to this provider: PORTA REAL verifies them directly.
- **Meta (WhatsApp):** when WhatsApp notifications are enabled and you activate them, the data necessary for that channel will be transmitted to the corresponding provider.
- **Google Calendar:** when CRM appointment sync is enabled, it will only apply if you yourself connect your calendar, and we will inform you of its scope at the moment you connect it.

Several of these providers operate wholly or partly outside Costa Rica, mainly in the United States of America. In doing so, they act as data processors or technology intermediaries of PORTA REAL: they process the data solely on behalf of PORTA REAL, following its instructions and for the purposes described in this Policy, without this implying a transfer of data to a new controller.

PORTA REAL contracts only providers that offer contractual guarantees of confidentiality, data protection, and security equivalent to those required by Ley N.° 8968 and its Regulations, and that undertake not to use the data for their own purposes, except as indicated for Auth0 and, with the Marketing category, for Google (section VI.a).

The processing of your data outside Costa Rica by these providers is carried out with your consent, given in accordance with the "Informed Consent" section.

The distribution of the content you publish with public visibility to search engines, artificial intelligence assistants, and social platforms, which process that content under their own policies, is governed by section III.a and by the Terms and Conditions (sections 7.1 and 16.4).

## VI. TRANSFER OF PERSONAL DATA TO THIRD PARTIES THAT PROCESS IT FOR THEIR OWN PURPOSES

A transfer of personal data occurs when a third party receives your data to use it for its own purposes, as an independent controller, and not on behalf of PORTA REAL. This happens only in the cases described below and under the conditions indicated for each. Because those third parties process the data under their own privacy policies, which PORTA REAL does not control, PORTA REAL limits what it discloses to them to what is indicated in this section.

**a. Advertising platforms (only if you accept the Marketing category)**

If, and only if, you accept the Marketing category in the cookie notice or in the cookie preference center, the advertising platforms listed below receive data from your visit and use it for their own purposes: attributing conversions to their ads, measuring and optimizing our campaigns, improving their advertising services and personalizing the ads shown to you. This authorization is given specifically and separately in the cookie notice, by clicking "Accept and continue" (which accepts all optional categories), or in the cookie preference center, by turning on the Marketing category: accepting this Policy or creating an account does not grant it. If you do not accept the Marketing category, PORTA REAL does not disclose any of your data to these platforms for their advertising purposes or for the measurement of our campaigns, does not load the TikTok or Meta pixels, and does not activate the advertising features of the Google tag. The foregoing does not cover Google Analytics (section V) or Google's maps service (section VI.b).

- **Google (Google Ads and the advertising features of the Google tag):** PostHog may send Google the conversion events of your visit that come from a click on a Google ad (for example, a completed registration), with their date and time, the identifier of that click, and an event identifier that includes a code derived from your account identifier (not the identifier itself), so that Google can attribute the conversion to that ad. In addition, the Google tag on the site activates Google's advertising features (Google Signals and ad personalization) and sets the advertising cookies listed in the Cookie Policy; as a result, Google may also use the data from your visit to personalize the ads it shows you. Google processes this data under its own privacy policy (policies.google.com/privacy).

- **TikTok (Pixel and Events API):** PostHog may send TikTok, through its Events API, the conversion events of your visit (for example, a completed registration), with the event type, its date and time, an event identifier that includes a code derived from your account identifier (not the identifier itself), the page address without its parameters, technical data about your connection (the IP address and your browser's user agent), the identifier TikTok assigns to your browser (the _ttp cookie), when it exists, and, if you arrived from a TikTok ad, the identifier of that click, so that TikTok can attribute the conversion to that ad. The TikTok pixel on the site also loads only with that acceptance: it records the pages you visit, with their web address (which may include the filters of a search) and that of the page you came from, and the completion of registration (with the campaign page through which you arrived, if any), with an identifier for that event that includes a code derived from your account identifier (not the identifier itself); it also records technical data about your browser and connection, and sets the cookies listed in the Cookie Policy. TikTok processes this data under its own privacy policy.

- **Meta (Pixel and Conversions API):** the Meta Pixel on the site loads only with that acceptance: it records the pages you visit, with their web address (which may include the filters of a search) and that of the page you came from, clicks on the buttons that lead to registration and the completion of registration (with the campaign page through which you arrived, if any), with an event identifier that, for a completed registration, includes a code derived from your account identifier (not the identifier itself) and, for clicks on the registration buttons, a random code which, if you accepted the Performance category, is the one PostHog assigns to your browser; it also records technical data about your browser and your connection, and sets the cookies listed in the Cookie Policy. With the same acceptance,

PostHog may send Meta, through its Conversions API, the completed registration event (with the campaign page through which you arrived, if any), with its date and time, an event identifier, a code derived from your account identifier (not the identifier itself), the page address without its parameters, technical data about your connection (the IP address and your browser's user agent) and the Meta identifiers associated with your browser or with a click on a Meta ad (the _fbp and _fbc cookies), when they exist, so that Meta can attribute the conversion to its ads. Meta processes this data under its own privacy policy (facebook.com/privacy/policy).

PORTA REAL never discloses your name, your email address, or your phone number to these platforms, and the codes of the platform's private and invitation links are never disclosed to them.

These platforms process the data outside Costa Rica, in the United States of America and in the other countries indicated in their own privacy policies; your authorization covers that processing outside the country.

You may withdraw your consent at any time from the cookie preference center. From that moment, PORTA REAL stops disclosing data from your visit to them and the site stops sending them information. Withdrawal has no retroactive effect on processing already carried out. If you withdraw your consent or delete your account and so request at soporte@porta.cr, we will communicate your revocation or your erasure request to those platforms within the following five (5) business days; in all other respects, the data they have already received remains subject to their own retention policies.

**b. Google Maps and Google Places**

The platform's interactive map and location search are Google services that load for every person who visits the pages that display them (for example, the home page and the search results page), regardless of their cookie preferences. When they load, Google receives your IP address and technical data about your browser directly from your browser, and sets its own cookies; what you type into the location search is sent to Google to suggest addresses to you. In addition to providing the maps service, Google uses that data for its own purposes, such as security, fraud prevention, and the operation of its service, under its privacy policy (policies.google.com/privacy), in the United States of America and in the other countries that policy indicates. PORTA REAL does not disclose any other data of yours to Google for these purposes. Google Maps cookies are described in the Cookie Policy.

**c. Real estate agents and agencies**

When you decide to share your data with a real estate agent or agency (for example, by sending them a message about a listing or by requesting a visit), they receive it as independent controllers, under the terms of sections III.b.2 and IV.

## VII. COMMUNICATIONS AND EMAILS

The communications we send you are divided into three levels:

**1. Essential communications (cannot be disabled)**

They are necessary to operate your account and your contractual relationship with PORTA REAL:

- Security and account management emails: email verification, password reset, and account security notices.
- Transactional billing emails: payment instructions when a charge is generated, confirmation of payment received, and notice when a payment could not be confirmed.
- Invitations: when an agency invites you to join or someone shares a collection with you (these may reach email addresses of people who are not yet users; see section III.e).
- Referral program notices: one-off notifications that you obtained a benefit already granted (for example, a free Featured Listing).
- Legal notices: notifications about changes to the Terms and Conditions, to this Privacy Policy, or to the Cookie Policy.

**2. Operational notifications (configurable by category)**

They inform you about your account's activity, and you can turn them on or off by category from your account settings on the platform:

- Search alerts: new properties matching your saved alerts.
- My listings: notices about the status of your listings (for example, if a publication is blocked by moderation).
- Expirations: notices before and after your publications expire.
- Messages: notices of new messages received in internal messaging.
- Weekly digest: a periodic activity summary, when enabled.
- Billing reminders: reminders before the end of your trial period, additional reminders during the grace period, and notice of the change to the free plan. (The first notice that a payment could not be confirmed is an essential transactional communication, item 1.)

When they are enabled, the professional layer's notifications (collaborations, alliances, CRM reminders, and appointments) and demand cohort notifications will also be configurable by category (the latter by email only if you have additionally enabled email notifications). Categories on this list that do not yet appear in your settings panel will be added gradually; in the meantime, those notifications are sent with the default configuration described in this section.

**3. Marketing (only with your consent)**

We will only send you marketing communications or newsletters if you expressly activate that option, which is off by default. We do not currently send any marketing communications.

Your communication preferences are managed from your account settings on the platform. Platform emails are sent from addresses on the **porta.cr** domain: notificaciones@porta.cr, alerts@porta.cr, expirations@porta.cr, digest@porta.cr, and suscripciones@porta.cr. Authentication and account security emails (email verification, password reset, and security notices) are sent by our identity provider, Auth0, from its own sender. If WhatsApp notifications are enabled, the same model will apply: you will only receive them if you activate that channel.

## VIII. YOUR RIGHTS

Under Ley 8968 de Protección de la Persona frente al Tratamiento de sus Datos Personales (Costa Rica's data-protection law), you have the following rights:

- **Access:** to know what data we process, for what purpose, and whether it has been shared with third parties.
- **Rectification:** to correct inaccurate, incorrect, outdated, or incomplete data.
- **Revocation:** to withdraw your consent to the processing of your data at any time, in whole or in part, and free of charge. Revocation has no retroactive effect: it does not affect the lawfulness of processing carried out before it. Revoking ancillary consents (for example, marketing communications, participation in Demand Cohorts, or the optional cookie categories) does not affect your account: only the corresponding feature stops operating. Revoking consent for the data essential to operate your account entails closing the account and ending the services that depend on it; you can do so by deleting your account from your account settings on the platform or by writing to us at **soporte@porta.cr**. If you exercise this right, PORTA REAL will retain only the data necessary to support future claims or to comply with legal obligations.
- **Deletion or Erasure:** to request the total or partial deletion of your data, in particular when it is no longer necessary for the purposes of this Policy, when you revoke your consent, or when the processing is contrary to Ley 8968. Deletion will not extend to the data PORTA REAL must retain under a legal obligation or for the periods in section IX, of which you will be informed in the response.

To exercise these rights, write to us at **soporte@porta.cr** stating the details of your request and attaching a copy of your identity document (cédula de identidad, DIMEX, or passport). If you act through a representative, the representative must prove their own identity and the power of attorney or authorization empowering them. Exercising these rights is free of charge. We will confirm receipt within no more than seventy-two (72) hours and resolve your request within no more than five (5) business days. If you believe your request was not addressed or that your rights have been violated, you may turn to the Agencia de Protección de Datos de los Habitantes (**PRODHAB**, www.prodhab.go.cr), Costa Rica's data-protection authority.

**Privacy controls within the platform**

In addition to the rights above, the platform offers you direct controls:

- **Public profile**: you can disable your profile's public visibility from the privacy settings (visible by default). Accounts with published listings or with closed transactions visible on their profile cannot disable it, because their listings require displaying the advertiser's contact information; and if you publish a listing while your profile is hidden, the profile is automatically reactivated at that moment.
- **Phone and WhatsApp**: the visibility of your phone number on your profile is optional and off by default; the WhatsApp button's visibility is on by default and you can turn it off.

- **Cookies**: you can change your cookie preferences at any time from the preference center (see the Cookie Policy), including withdrawing your consent to usage analytics (Performance category) and to advertising measurement and the disclosure of data to advertising platforms (Marketing category).
- **Demand cohorts**: participation is voluntary, off by default, and revocable at any time; you can also mute specific professionals.
- **Notifications**: per-category preferences under section VII, including per-conversation muting in messaging.

## IX. RETENTION OF PERSONAL DATA

Personal data will be retained for a maximum period of five (5) years counted from the user's last date of activity with PORTA REAL.

Once that period has elapsed without activity on the account, PORTA REAL may delete the account together with its personal data, after giving notice to the registered email address at least thirty (30) days in advance. If you request the erasure of your data or delete your account before that period ends, we will proceed in accordance with the subsection "What happens when you delete your account?".

In any of those cases, PORTA REAL will retain only the data it must keep by legal requirement or for the specific periods in the following table. Once those periods expire, PORTA REAL undertakes to delete the data or to dissociate it from its data subject, so that it does not allow you to be identified. In no case will identifiable personal data be retained for more than ten (10) years from the date of the recorded events, in accordance with the Regulations to Ley N.° 8968.

The specific periods are:

| Data category | Retention period |
|---|---|
| Visitor data | 2 years from the last visit |
| Billing records (amount, dates, period, reference, payment method) | Four (4) years (Código de Comercio and tax regulations), or any longer period a rule requires; once that period expires, PORTA REAL undertakes to delete them or to dissociate them from your identity. If you delete the account, they are dissociated from your identity at that moment |
| Click-behavior data (subject to cookie consent) | 12 months |
| Usage and campaign analytics events recorded in PostHog (subject to cookie consent) | 2 years from your last visit or activity on the platform: once that period has elapsed without activity, PORTA REAL undertakes to delete your events from PostHog and, if it exists, the profile associated with your account identifier. PostHog does not apply this period on its own. While you continue to use the platform, your earlier events are retained, in no case exceeding the maximum of seven (7) years that PostHog applies |

| Data category | Retention period |
|---|---|
| Campaign-origin data | In your browser, at most 90 days from each visit attributed to a campaign (and 7 days for the record of the campaign page through which you arrived); deleted if you withdraw your consent for the Performance category; the data included in the registration event, together with the PostHog events in the previous row; once its association with the account is activated (section III.a), while the account exists |
| Aggregated listing impression metrics | 90 days |
| Aggregated view counters | 120 days |
| Documents in custody | 5 years after the professional relationship ends; once that period expires, PORTA REAL undertakes to delete them |
| Collaboration evidence records | 5 years after the professional relationship ends; once that period expires, PORTA REAL undertakes to delete them or to dissociate them from the parties |
| Messages and messaging attachments | While the conversation exists, and in any case within the maximum period indicated at the beginning of this section. If you or the other person deletes their account, the entire conversation is deleted for both |
| Original text of messages a user deletes | Twelve (12) months from their deletion, for the review of abuse reports (section X); once that period expires, PORTA REAL undertakes to delete it |
| Listing reports | Those from visitors without an account, 2 years; those from users, until the account of the person who reported or the reported publication is deleted, and in any case within the maximum period indicated at the beginning of this section |
| Search, intelligent search, AI generation, and import logs | While the account exists (deleted with it) |
| Records of acceptance of terms and policies | While the account exists |
| Security audit and account-change logs (which include the account's email address and identifier) | Five (5) years from the account's last activity, even if you have deleted it; once that period expires, PORTA REAL undertakes to delete them or to dissociate them from your identity |

**What happens when you delete your account?**

When you delete your account:

**Deleted**: your profile, your publications and their photos, videos, and documents, your favorites, collections, alerts, search histories, acceptance records, your conversations and messages (also for the other person in each conversation), your personal subscription, and the payment receipts you attached. The analytics events associated with your account identifier in PostHog are also deleted, including the campaign-origin data from your registration; this deletion may take a few days, and PostHog events not associated with your account follow the period in the table above. Your identity at the authentication provider (Auth0) and your stored files are also deleted; in external systems, deletion is handled using reasonable efforts.

**Retained**, to the extent described in this section:

- Billing records, **dissociated from your identity**, for the periods of the Código de Comercio.

- Security audit and account-change logs, for the period indicated in the table above.
- The collaboration evidence records and documents in custody of professional relationships you were a party to are retained for the period in the table above, so that the record both parties consented to when activating the professional features preserves its evidentiary value for the other party. In these records, your identifying data is limited to what is strictly necessary for that record: your name as registered when the agreement was accepted, and the signed document as uploaded, whose integrity (SHA-256 fingerprint) prevents altering it. Buyers appear in these records only pseudonymously (for example, "Buyer #3"). Your profile, your contact details, and the rest of your account are indeed deleted.
- If an agent registered you in their CRM, their sales pipeline history is retained **without your identity** (the data that identifies you is deleted; the agent sees only the anonymous trail of their own management).
- The conversion events that, with your Marketing consent, had already been disclosed to advertising platforms before the deletion, which those platforms process as independent controllers under their own retention policies (section VI). From the deletion onward, PORTA REAL stops disclosing your data to them and, if you so request, will communicate your erasure request to them in accordance with section VI.a.

## X. ACCESS BY PORTA REAL STAFF

Authorized PORTA REAL staff may access personal data only to the extent necessary to operate the platform, moderate content, ensure security, prevent fraud, and provide you with support. In internal messaging, when a user deletes a message, it is no longer shown in the conversation, but its original text is retained internally, without access for other users, for a maximum of twelve (12) months from its deletion, for the review of abuse reports; once that period expires, PORTA REAL undertakes to delete it. All administrative access is subject to internal controls and duties of confidentiality.

## XI. PERSONAL DATA SECURITY

We adopt appropriate technical and organizational measures to protect your information. Our infrastructure runs on Amazon Web Services with encryption at rest and in transit. If a security breach affecting your personal data is detected, we will notify you and, where applicable under the Regulations to Ley N.° 8968, the Agencia de Protección de Datos de los Habitantes (PRODHAB), within no more than five (5) business days from the moment we become aware of the incident. The notification will include the nature of the incident, the personal data compromised, the corrective actions taken, and recommendations of measures you can take to protect your interests.

## XII. MINORS

Our services are not directed at persons under 18 years of age, and we do not knowingly collect, sell, or share information about minors. If you become aware of such a case, write to us at **soporte@porta.cr** so we can investigate and, if appropriate, delete the data.

## XIII. MODIFICATIONS TO THIS POLICY

PORTA REAL may modify this Policy when circumstances warrant it or in response to regulatory reforms. We will notify you at least ten (10) business days before any modification takes effect, through the contact channels registered in your account or through a visible notice on the platform. If the change involves new processing purposes that require your consent, we will request it before applying them, in accordance with Ley N.° 8968. The current version will always be available in this section.

## XIV. CONTACT INFORMATION

For any inquiry, request, or complaint, write to us at **soporte@porta.cr**. This Policy is drafted in Spanish; translations into other languages are provided solely as an informational courtesy and, in the event of any divergence, the Spanish version prevails.

If you decide to write to us via WhatsApp (+506 8612-9861) or by direct message on our official social media profiles, the conversation is handled through those Meta services, which process your data under their own terms and outside Costa Rica. PORTA REAL uses the data from that conversation solely to handle your inquiry and retains it within the periods in section IX. If you prefer, you can write to us at soporte@porta.cr.

## INFORMED CONSENT

The data subject (you) gives their informed consent, freely, specifically, expressly, and unequivocally, to PORTA REAL, in its capacity as controller, for it to process your personal data in accordance with the processing operations and purposes described in this Privacy Policy, attesting to that consent, acceptance, and understanding through any messaging platform through which you contact PORTA REAL, or by clicking the checkbox "I have read and agree to give my consent to the processing of my personal data in accordance with the privacy and data protection policies" (text shown in the app), which is presented to you when you create your account and each time a new version of this Policy is published. This consent covers the disclosure of your data to the providers acting as data processors and its processing outside Costa Rica, under the terms of section V, as well as Google's receipt of data when the map loads, under the terms of section VI.b. It also covers the retention periods in section IX.

The purposes necessary for providing the service are identified as such in section IV of this Policy. If you do not authorize them, it will not be possible to create your account, handle your request, or manage your inquiries through PORTA REAL's digital channels, including its website, its mobile application, and its social media profiles.

Optional purposes, such as promotional communications, participation in Demand Cohorts, registration as a referred buyer, or the disclosure of your data to a professional when you request a visit or send them a first message, require a specific decision of yours at the moment you decide to use them: turning on the corresponding option, or sending the request or the message after the notice shown to you. Likewise, usage analytics and campaign measurement (Performance category) and the disclosure of data to advertising platforms that process it for their own purposes (Marketing category, section VI) are only carried out if you accept them in the cookie notice or in the cookie preference center (in this Policy, accepting a category "in the cookie preference center" includes

accepting it through the notice's "Accept and continue" button): accepting this Policy does not authorize them. You may accept or reject each optional purpose without affecting your access to the rest of the services.

You may revoke your consent at any time and free of charge, pursuant to section VIII of this Policy. Optional cookie categories are withdrawn from the cookie preference center.

PORTA REAL keeps, while your account exists, proof of each consent given through that checkbox, indicating the date, the time, the version of this Policy in force when it was given, and the IP address and user agent from which it was given.