

TRULO CORPORATION

COOKIE POLICY

Effective Date: March 1, 2026

Last Updated: March 1, 2026

This Cookie Policy explains how Trulo Corporation ("Trulo," "we," "us," or "our") uses cookies and similar tracking technologies on jointrulo.com and the Trulo Platform (collectively, the "Site"). This Policy is incorporated by reference into Trulo's Privacy Policy.

1. What Are Cookies?

Cookies are small text files placed on your device by a website when you visit. They allow the website to remember your actions and preferences (such as login status, language, and display settings) over a period of time, so you do not have to re-enter them each time you return. Cookies are not programs and cannot execute code or deliver viruses.

In addition to cookies, Trulo may use similar technologies including web beacons (transparent pixel images used to track page visits and email opens), local storage (browser-side data storage), session storage (temporary in-browser storage cleared on browser close), and device fingerprinting (limited use, described below).

2. Categories of Cookies We Use

2.1 Strictly Necessary Cookies

These cookies are essential to the operation of the Platform and cannot be disabled without breaking core functionality. They do not track personal information for marketing purposes and are set only in response to actions you take (e.g., logging in, submitting a form, processing a payment). No consent is required for strictly necessary cookies under applicable law.

- Authentication and session management — keeps you logged in during a session
- CSRF protection tokens — prevents cross-site request forgery attacks
- Load balancing — ensures your requests reach the correct server
- Payment processing session tokens — required by Stripe for secure checkout
- Access credential delivery — secure one-time tokens for Space access

2.2 Functional Cookies

These cookies enable enhanced functionality and personalization. They remember your preferences so you do not need to re-enter them. Disabling functional cookies may reduce the quality of your Platform experience.

- Language and locale preferences
- Display preferences (list vs. map view, saved filters)
- Recently viewed Listings
- Saved search parameters
- Chat and messaging session continuity

2.3 Analytics and Performance Cookies

These cookies collect aggregated, anonymized information about how visitors use the Site — which pages are visited most, error messages encountered, and how users navigate between pages. We use this data to improve the Platform. Analytics cookies do not directly identify you as an individual.

- Google Analytics (anonymized IP, session duration, page views)
- Trulo internal analytics platform (funnel analysis, feature usage)
- Error and performance monitoring (Sentry or equivalent)

2.4 Marketing and Targeting Cookies

Marketing cookies are used to deliver advertisements relevant to you and your interests, and to measure the effectiveness of advertising campaigns. They track your visits across websites and may share information with advertising partners. These cookies require your explicit consent before they are set.

- Meta Pixel (Facebook/Instagram ad attribution)
- Google Ads conversion tracking
- LinkedIn Insight Tag (B2B remarketing)
- Retargeting pixels from third-party ad networks

You may withdraw consent for marketing cookies at any time through the Cookie Preference Center (see Section 5).

2.5 Third-Party Cookies

Some cookies are set by third-party services embedded in the Platform (e.g., Stripe, Google Maps, Intercom customer support). These third parties have their own privacy and cookie policies, which govern how they use any data they collect. Trulo does not control third-party cookies. Links to relevant third-party policies: Stripe (stripe.com/privacy), Google (policies.google.com).

3. How Long Do Cookies Last?

Session cookies: Expire when you close your browser. Used for authentication and temporary preferences.

Persistent cookies: Remain on your device for a set period (ranging from 30 days to 2 years depending on the cookie). Used for remembered preferences, analytics, and marketing attribution.

Trulo periodically reviews cookie retention periods to ensure they are no longer than necessary for their stated purpose, consistent with Trulo's Privacy Policy data minimization principles.

4. Legal Basis for Cookie Use

Trulo's cookie practices are governed by applicable U.S. law, including the California Consumer Privacy Act (CCPA) for California residents, and Trulo's voluntary adoption of consent-based practices for non-essential cookies consistent with international best practices. Trulo does not currently operate in the European Economic Area and this Policy does not constitute a GDPR-compliant cookie notice, though Trulo applies GDPR-equivalent consent standards for marketing and analytics cookies as a matter of policy.

- Strictly necessary cookies: Legitimate interest / operational necessity — no consent required
- Functional cookies: Legitimate interest — opt-out available
- Analytics cookies: Consent — opt-out available at any time
- Marketing cookies: Explicit consent required before placement — opt-out available at any time

5. Your Cookie Choices

5.1 Cookie Preference Center

When you first visit the Site, a cookie consent banner will appear allowing you to accept all cookies, reject non-essential cookies, or customize your preferences by category. Your preferences are saved and can be updated at any time by clicking "Cookie Settings" in the Site footer.

5.2 Browser-Level Controls

Most browsers allow you to refuse or delete cookies through browser settings. Instructions for managing cookies in common browsers:

- Chrome: Settings > Privacy and Security > Cookies and other site data
- Firefox: Options > Privacy & Security > Cookies and Site Data
- Safari: Preferences > Privacy > Manage Website Data
- Edge: Settings > Privacy, search, and services > Cookies

Note: blocking all cookies through browser settings will disable strictly necessary cookies and may prevent you from logging in or using core Platform features.

5.3 Opt-Out of Analytics

You may opt out of Google Analytics tracking across all websites by installing the Google Analytics Opt-out Browser Add-on available at tools.google.com/dlpage/gaoptout.

5.4 Do Not Track (DNT)

Trulo honors browser Do Not Track (DNT) signals for analytics and marketing cookies. When a DNT signal is detected, Trulo will not place analytics or marketing cookies unless you have separately provided consent through the Cookie Preference Center.

5.5 Global Privacy Control (GPC)

Trulo recognizes and responds to the Global Privacy Control (GPC) browser signal. The GPC is a standardized browser-level signal (implemented via browser extensions such as Privacy Badger, DuckDuckGo Browser, Brave, and others) that communicates a user's opt-out preference for the sale and sharing of personal information.

When Trulo detects a valid GPC signal from your browser:

- For California residents (CPRA): Trulo treats the GPC signal as a valid opt-out of the sale and sharing of personal information for cross-context behavioral advertising, consistent with California Privacy Rights Act (CPRA) § 1798.135(d) and California Attorney General guidance;
- GPC opt-out is processed automatically and in real time — you do not need to separately submit an opt-out request;
- Marketing and targeting cookies that facilitate the sale or sharing of personal information will not be placed during sessions where a valid GPC signal is detected;
- Strictly necessary, functional, and analytics cookies may still be placed as described in Section 2, as their use does not constitute a 'sale' or 'sharing' under applicable privacy law.

Trulo does not override, suppress, or downgrade the GPC signal. If you use both a GPC signal and Trulo's Cookie Preference Center, the more privacy-protective setting will apply. Note that the GPC signal is specific to the browser session and device on which it is enabled — it does not apply across all your devices automatically.

6. Cookie List

A detailed list of specific cookies in use, including name, provider, purpose, type, and retention period, is maintained in Trulo's Cookie Disclosure Register, which is accessible through the Cookie Preference Center. Trulo updates this register within 30 days of adding new cookies to the Platform.

7. Changes to This Policy

Trulo may update this Cookie Policy to reflect changes in cookie use, legal requirements, or Platform features. Material changes will be communicated by updating the "Last Updated" date at the top of this Policy and by displaying a prominent notice on the Site for 14 days following the update. Continued use of the Site after the effective date of a material change constitutes acceptance of the updated Policy.

8. Contact

- Cookie and privacy questions: privacy@jointrulo.com
- Cookie Preference Center: accessible via footer on jointrulo.com
- Mailing: Trulo Corporation, Attn: Privacy Office, 123 Main Street, Boston, MA 02101