



CA Privacy Policy Supplement

Legal, Risk & Compliance

Version Update: 04.03.2023

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CA Privacy Policy Supplement

This Supplemental Privacy Policy supplements and is expressly made part of the information contained in the Eastdil Secured [Privacy Policy](#) and applies to Eastdil Secured’s collection and use of any California resident’s Personal Information (collectively, the “Policy”), including where such use is governed by the California Privacy Rights Act, which amends and is the successor to the California Consumer Privacy Act (hereafter, “CPRA”). In this Policy, references to “Eastdil Secured” “we,” “us” or “our” means and refers to Eastdil Secured as defined in the Eastdil Secured Privacy Policy. Any terms defined in the CPRA have the same meaning when used in this Policy, and any terms defined in the Eastdil Secured Privacy Policy shall also apply to this Supplemental Privacy Policy.

Personal Information We Collect

We collect, process and retain various types of personal information. “Personal Information” means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. Personal Information does not include de-identified or aggregate information, or public information lawfully available from government records.

The following chart describes, by category, the types of Personal Information covered by this Policy that we have collected from our consumers (including but not limited to employees) within the last twelve (12) months:

Category of Personal Information	Purpose(s) for Collection	Categories of Source(s)	Categories of Third Persons With Which PI Was Shared	Categories of Third Parties To Which PI was Sold	Data Retention (Specify Years)
Identifiers and PI categories under California customer records statute such as a name, postal address, telephone number, partial credit	Sales & marketing to actual, former, or prospective Eastdil Secured clients & investors and their partners	Data provided by actual, former, or prospective clients & investors and their partners; we do not	None	None	7 years

Category of Personal Information	Purpose(s) for Collection	Categories of Source(s)	Categories of Third Persons With Which PI Was Shared	Categories of Third Parties To Which PI was Sold	Data Retention (Specify Years)
and debit card information, unique personal identifier, online identifier, Internet Protocol address, email address, account name.		purchase external lists			
Internet or other similar network activity including browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Technical and other identifiers, as well as general site traffic, are collected for security, tracking, and auditing	Website users & visitors	None	None	1 year
Geolocation data including physical location or movements.	N/A				
Sensitive Personal Information	HR, payroll, job applicant, benefits, and	Current, prospective, and former	Data is shared with service	None	7 years (or for employee and

Category of Personal Information	Purpose(s) for Collection	Categories of Source(s)	Categories of Third Persons With Which PI Was Shared	Categories of Third Parties To Which PI was Sold	Data Retention (Specify Years)
<p>including government-issued identifying numbers, financial account details that allow access to an account, genetic data, race or ethnicity, religious beliefs, union membership, contents of a user's mail, email, or texts, unless Eastdil Secured is recipient, biometric data, health data—when collected and analyzed, sexual orientation—when collected and analyzed</p>	<p>contractor management</p> <p>Property Offerings including Multifamily (MF) and Single Family Residential (SFR) investments may include PII, drivers licenses, and historical lease/credit histories for current or former residents within a property to help aid in the transaction process</p>	<p>employees and contractors supply information to ES and by utilizing software and other services involving ES vendors: Trinet (US), Vistra (EMEA), & WeConnect (APAC)</p> <p>MF and SFR Offerings and supporting data</p>	<p>providers, e.g., insurance carriers, as well as ES vendors such as Trinet, Vistra, WeConnect, as well as certain government and self-regulatory agencies as required under applicable laws, rules, and regulations</p> <p>Offerings in MF and SFR will be shared with Buyers of said properties</p>		<p>contractor data, 6 years after date of termination if later)</p>

Additional Information About Use and Sharing of Personal Information

In addition to the sharing of Personal Information as reflected on the chart above, we may disclose any information, including Personal Information, we deem necessary, in our sole discretion, to comply with any applicable law, regulation, legal process or governmental request, including to respond to subpoenas or warrants served on us, or in connection with detection, prevention or investigation of fraud. In addition, we may disclose information about you when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual violation of ES policies, as well as unethical, fraudulent, or illegal activity.

We may share some of your Personal Information with service providers and contractors who perform services on our behalf based on our instructions. We do not authorize these service providers and contractors to use or disclose the information except as necessary to perform services on our behalf or to comply with legal or self-regulatory requirements, however we are not responsible for nor do we police what service providers and contractors do or do not do. Examples of these service providers include entities that provide web hosting and data processing services as well as to manage human resources and data security.

We also reserve the right to transfer Personal Information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with our Policy. Following such a sale or transfer, you may contact the entity to which we transferred your personal information with any inquiries concerning the processing of that information.

How We Use the Information

We may use the information you provide to:

- Analyze, manage and improve our website;
- Effectuate your engagement of us (e.g. prepare and execute our engagement documentation);
- Carry out your instructions during our engagement, including to assess suitable investment opportunities;
- Secure your information on our central systems and ensure that our central administration teams can best support your Eastdil Secured team;
- Assess whether you can benefit from or are suited to other opportunities with our affiliates and/or putting you in contact with teams in different markets or offering different services from within the Eastdil Secured or its affiliates;
- Take appropriate security measures in relation to our physical location (e.g. provide you with access cards at our premises) as well as our Website, email and other of our external systems;
- Respond to your inquiries;
- Process any applications you may submit;

- Operate, evaluate and improve our business; analyzing our services; performing data analytics; and performing accounting, auditing and other internal functions;
- Comply with our regulatory and legal obligations and legal requirements, relevant industry standards and our policies; and
- Effect other requests you might make of us during our engagement.
- Processing payroll and carrying out other employee-related and human resource functions

We also may use the information in other ways for which we provide specific notice at the time of collection or that relate to the foregoing.

Sales, Sharing and Disclosure of Personal Information

We do not sell, rent, lease, or share or disclose your Personal Information to unaffiliated third parties for commercial or marketing purposes or otherwise, subject to the provisions set forth above.

Your Rights and Choices

Right To Know

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. When we receive your request to know what Personal Information we have collected from you, we will disclose to you: (i) the categories of personal information we collected about you; (ii) the categories of sources from which that information was collected; (iii) our purpose for collecting or selling that personal information; (iv) the categories of third parties with whom we share that personal information; (v) the specific items of personal information that we collected about you; and (vi) if we sold or disclosed your personal information for a business purpose, we will identify for sales of information, the personal information categories that each category of recipient purchased; and, where we have disclosed your personal information for a business purpose, we will identify the personal information categories that each category of recipient obtained. You may request these disclosures twice within a twelve month period.

Right To Delete Personal Information

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your request to delete your personal information, we will delete (and direct our service providers and contractors to delete) such information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) or contractors to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with legal obligations including but not limited to superseding regulatory requirements such as FINRA and SEC regulations.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to Correct Inaccurate Information

You have the right to request that we correct any of your Personal Information that we collected from you and retained that is inaccurate. Once we receive and confirm your request to correct your Personal Information, we will correct (and direct our service providers and contractors to correct) such information from our records, unless an exception applies.

Verifiable Consumer Requests

If you submit a request to us to disclose how we collect and use your Personal Information or to delete your Personal Information from our records, we must be able to verify your request. To be “verifiable,” you must provide sufficient information to allow us to reasonably verify that you are the person about whom we collected Personal Information or that you are an authorized representative of that person and you must describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it (a “verifiable consumer request”). We cannot respond to your request if it is not a verifiable consumer request. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request. You may also make a verifiable consumer request on behalf of your minor child. To make a verifiable consumer request for disclosure of our collection and use of your personal information or to delete your personal information, you can contact us at dpr@eastdilsecured.com.

We will try to respond to a verifiable consumer request within 45 days of its receipt. If we need more time (up to 90 days), we will let you know in writing, either by email or mail (or, if you have an account with us, through your account), why we need more time and when we will provide our response. There is no charge to you for us respond to your verifiable consumer request, unless it is excessive, repetitive, or manifestly unfounded. If we determine that the



request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Right to Non-Discrimination

We will not discriminate against you for exercising any of your rights under the CPRA. Accordingly, by way of example, we will not deny you goods or services; charge you different prices or rates for goods or services, including through granting discounts or other benefits, or impose penalties; give you a different level or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may, however, offer you certain financial incentives permitted by the CPRA that can result in different prices, rates, or quality levels provided that such incentive is reasonably related to the value of the Personal Information. We will not include you as a participant in any financial incentive program without your prior "opt-in" consent, which you may revoke at any time.

Security of Your Personal Information

Eastdil Secured takes reasonable precautions to protect the security of your Personal Information. Our Web site is hosted on servers that utilize SSL server software. Any credit card information that you provide is encrypted while it is being transmitted over the Internet in order to reduce the possibility that such information can be read by an unauthorized person. We maintain appropriate administrative, technical and physical safeguards designed to protect the Personal Information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. However, no security system is perfect and we cannot promise that information about you will remain secure in all circumstances, including the security of your data during transmission to us or the security of data on your mobile device.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Websites that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to drp@eastdilsecured.com.

Changes to Our Privacy Policy

We will review and update this Policy as we deem necessary and/or as required to remain in compliance with rules and regulations, and to keep current with new technologies and security standards. When we make changes to the Policy, we will post the updated Notice on the Website and update the Policy's effective date. **Your continued use of our Websites following the posting of changes constitutes your acceptance of such changes.**



Contact Information

If you have any questions or comments about this Policy, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 888-732-2278

Email: dpr@eastdilsecured.com

Responsible Executive	Aimee Florin
Procedures Owner	Aimee Florin

Version	Date	Description of Change
1.0	4/03/2023	Initial Publication