

# PRIVACY POLICY RECOMMENDATION

Prado Group and Vanke understand that the privacy of information you provide to us is important to you. We have prepared this Privacy Policy to explain the types of information and data we collect; how we obtain, use, protect, transfer, share and disclose such information and data; and to explain your choices for managing your information preferences. This Privacy Policy applies to information that we collect on any company websites (collectively, “Website”), through any mobile applications and other online or electronic services offered under this Privacy Policy (collectively, “Systems”), and other services offered by us, such as collection of information that may occur when you visit the residential community 2238 Market. By using the Website or any Systems or providing information to us at 2238 Market, you consent to this Privacy Policy. If you do not agree with this Privacy Policy, you should not use the Website or any Systems, or otherwise provide your information to us.

We may change this Privacy Policy from time to time. If we change this Privacy Policy, we will inform you by posting the revised Privacy Policy on the Website. Accordingly, you should check this Privacy Policy frequently for any changes to understand how the changes will affect you. The changes become effective when they are posted to the Website. The most recent version of the Privacy Policy is reflected by the date located at the top of this Privacy Policy. By continuing to use the Website and Systems, or by otherwise providing your information to us, you are consenting to the Privacy Policy as updated.

## INFORMATION WE COLLECT

### PERSONAL INFORMATION

We collect personally identifiable information, such as your name, alias, signature, address, phone number, mobile phone number, e-mail address, and other information that personally identifies you (collectively, “Personal Identification Information”). In connection with the receipt of your Personal Identification Information, we may also receive other information about you, such as your desired home type, current residential status (e.g., whether you rent or own), how you learned about the community, our other communities that you are interested in, agent or

broker that you work with, and your other preferences and characteristics (collectively with the Personal Identification Information, the “Personal Information”).

We receive your Personal Information when you voluntarily provide it to us through features of our Website and Systems, such as information request forms and account registration forms. We also receive your Personal Information when you voluntarily provide it to us through visits to the community, such as when you fill out a prospective buyer registration card. We may also receive Personal Information (such as your social network ID) from third party social media websites and services if you choose to enable certain features, such as logging in with your social media account information.

If you purchase a home in the community, we may receive certain other Personal Identification Information and Personal Information about you in connection with the purchase, such as your social security number, driver’s license number or other government identification number, occupation, and employer.

Personal Information may be collected directly by us or by third party service providers that we contract with to act on our behalf.

## USAGE DATA

We automatically collect certain other information and usage data (collectively, the “Usage Data”) when you use our Website and Systems. The Usage Data may include, without limitation, your IP address, the type of web browser you use, your operating system, your language settings, your internet service provider, the pages you view on our Website, your access times and durations, your movements on our Website and Systems, the content of any undeleted cookies that your browser previously collected from us, the referring website address, and your movement to other websites that are linked through our Website and Systems. We may use cookies and other tracking technologies to collect this information, as described in the “Cookies and Other Tracking Technologies” section below.

The Usage Data that we collect is typically anonymous and not linked to a particular person or household. However, if you voluntarily register with our Website or Systems (such as by filling out an online registration form to join our interest list), we may be able to connect the Personal

Identification Information you provide to Usage Data collected when you use the same device and/or network that you used to register with us, and we may do so. If we connect your Usage Data to your Personal Identification Information, such Usage Data shall be considered “Personal Information” under this Privacy Policy.

It may be possible to link certain Usage Data (such as IP address) to a particular individual or household. However, except in cases where the user has voluntarily registered with our Website or Systems (as described above), we do not undertake to use Usage Data in order to obtain information that identifies a particular individual or household.

Usage Data may be collected directly by us or by third party service providers that we contract with to act on our behalf.

#### COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use tracking technologies such as cookies, web beacons, and similar technologies to collect Usage Data. Generally, these tracking technologies are small data files placed on your computer, mobile phone, or other devices that allow us to recognize a device, track user activity, and collect Usage Data. Tracking technologies allow us to offer you a more personalized experience, including the ability to keep track of information so that you do not have to re-enter it each time you visit our Website and Systems. The tracking technologies also enable us to collect Usage Data about users’ visits to our Website and Systems in order to support our marketing and promotional efforts and to operate and administer our Website and Systems.

Unless you register with our Website or Systems, information collected by these tracking technologies is anonymous and we do not use tracking technologies in order to obtain Personal Identification Information. If you voluntarily register with our Website or Systems (such as by filling out an online registration form to join our interest list), we may be able to connect the Personal Identification Information you provide to information collected from tracking technologies about your usage and interaction with our Website and Systems when you use the same device and/or network that you used to register with us, and we may do so. As described above, if we connect your Usage Data to your Personal Identification Information, such Usage Data shall be considered “Personal Information” under this Privacy.

We may use third party advertising companies and networks in order to deliver our advertising to you on the Website and Systems and on other third party websites that you visit. These third party companies and ad networks may collect Usage Data about your visits to our Website and Systems and other third party websites in order to provide targeted advertising to you.

We may use Google Analytics. Google Analytics is a web analysis service offered by Google that collects, tracks and analyzes Usage Data. For more information about how Google Analytics collects and processes data, visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), or any successor URL. We may implement certain Google Analytics advertising features, including, Remarketing with Google Analytics, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, Segments and Campaign Manager. To learn how to opt out of Google Analytics tracking, visit <https://tools.google.com/dlpage/gaoptout>, or any successor URL.

Our Website and Systems may provide access to Google Maps and we may collect and track Usage Data in connection with your use of Google Maps on our Website and Systems. Google may also use such information and you should refer to Google's privacy policy at <https://policies.google.com/privacy> for more information.

#### HOW WE USE INFORMATION

We use the information we collect to support our marketing and promotional efforts and to enhance the services we provide. We may use your Personal Information in order to respond to your requests, provide services to you, and contact you with advertisements and informational messages. For example, we may use your Personal Information to call you and to deliver marketing e-mails, text messages and/or direct mail to you.

If you purchase a home from us, we will use your Personal Information to communicate with you about your purchase and for business purposes related to the completion of the purchase. We may also communicate with you after the purchase about your home and related services.

The Company may also use Usage Data that we collect for analytical purposes in conjunction with our marketing and promotional efforts and to improve our Website and Systems. The Usage Data we collect may be used to examine user preferences, compile statistics, and to administer and

improve our Website and Systems. As described above, Usage Data and tracking technologies may be used to provide our marketing materials to you.

We may use Personal Information and Usage Data we collect to launch “lookalike” audiences and campaigns using Facebook’s Lookalike Audience feature. Additional information is available at <https://www.facebook.com/business/help/164749007013531>. Facebook’s privacy policy is available at <https://www.facebook.com/privacy/explanation>.

We do not sell your Personal Information that we receive to third parties.

#### HOW WE SHARE AND DISCLOSE INFORMATION

We may share Personal Information and Usage Data that we collect with our trusted third party service providers or agents to provide services for us and/or to perform services on our behalf. We may contract with service providers to provide certain information technology (IT) services for us, such as data storage and hosting and maintenance services for our Website and Systems. We may also contract with service providers to perform marketing and promotional services for us and to deliver advertising to you and others on our behalf (e.g., e-mail, text message, and/or direct mail campaigns).

We disclose Personal Information and other information as required by law, such as to comply with a subpoena or similar legal process. We may also disclose Personal Information and other information to government or law enforcement officials or private parties as we deem reasonably necessary or appropriate in order to comply with the law, protect our rights or property, protect your health and safety or the health and safety of others, investigate fraud, or respond to a government request.

In addition to the sharing and disclosure described above, the Company may compile Personal Information and Usage Data and disclose such information in aggregate and/or in a deidentified form to advertisers for marketing and promotional purposes. However, in these situations we will not disclose information that could be used to personally identify you.

#### LINKS TO OTHER WEBSITES

The Website and Systems may contain links to third party websites or services not operated or controlled by Company. We have no control over those third party websites or services and they are not governed by this Privacy Policy. You should review the applicable privacy policy of those third parties to learn how your information will be collected and used.

#### SOCIAL MEDIA WEBSITES AND PLATFORMS

The Company may have pages on various social media websites and platforms, such as Facebook, Yelp, Instagram, LinkedIn, YouTube, and Google My Business. The social media websites and platforms may provide opportunities for you to post communications or other material on message boards, chat rooms, or through other features. You are responsible for reviewing the applicable terms of use of such websites and complying with all requirements contained therein. You should also understand that by posting information to social media websites and platforms, you may be revealing your Personal Information to the public. The Company has no control over what others may do with any information that you post to our pages on social media websites and platforms. Social media websites and platforms may collect your Personal Information. Our pages on such social media websites and platforms are not governed by this Privacy Policy. It is your responsibility to review the applicable privacy policy to understand how your Personal Information may be collected and used.

#### CHILDREN'S PRIVACY

Our Website and Systems are not intended for anyone under the age of thirteen (13). We do not knowingly collect information from children under the age of 13.

#### SECURITY AND PROTECTION

We take commercially reasonable measures to safeguard the confidentiality and security of information we collect and that is transmitted via our Website and Systems. However, no data transmission over the internet or other network can be guaranteed to be completely secure. Accordingly, we cannot and do not guarantee the security of any information that users transmit through the Website or Systems.

## NOTICE OF YOUR CALIFORNIA PRIVACY RIGHTS *(For California Residents Only)*

The Company and its service providers may have previously deidentified or aggregated your Personal Information in such a way that it does not personally identify you, in which case it shall not be treated as “Personal Information” under this “Notice of Your California Privacy Rights.”

### CALIFORNIA CONSUMER PRIVACY ACT

*“Request to Know.”* Under the California Consumer Privacy Act (the “CCPA”), California residents have the right to request that the Company disclose what Personal Information it collects, uses, discloses and sells (referred to as a “Request to Know”). The Company has not and does not sell Personal Information that it receives to third parties. This Privacy Policy describes the categories of Personal Information we collect, the categories of sources from which Personal Information is collected, the business or commercial purpose for collecting Personal Information, and the categories of third parties with whom we share Personal Information. Pursuant to the CCPA, you have the right to request specific pieces of Personal Information that we have collected about you.

*“Request to Delete.”* Under the CCPA, California residents also have the right to request that the Company delete any Personal Information which we have collected from such resident (referred to as a “Request to Delete”). We may not be able to delete your Personal Information in response to such a request in certain circumstances, such as if we need to maintain the Personal Information in connection with your purchase of a home from the Company, if you registered as a prospective buyer and we need to maintain such information in connection with a broker referral program, to comply with a legal obligation, or in other circumstances. We will notify you if you request that we delete your Personal Information and we are unable to do so.

To submit a request under the CCPA, please contact us by any of the following methods: (a) by e-mail at [Info@2238market.com](mailto:Info@2238market.com), or (b) submit a written request at our sales office located at 850 7<sup>th</sup> Street, San Francisco, CA 94107. When you submit a request by e-mail or in writing, please use “California Privacy Request – CCPA” in the subject line so that we may properly route your request. With your request, please specify whether you are submitting a “Request to Know” and/or “Request to Delete,” as described above. If you are submitting a “Request to Know,” please describe the information pursuant to the CCPA that you are requesting. We will contact you for additional information if we are unable to determine the specific nature of your request.

Please allow forty (45) days for us to respond to your request. We will let you know if we need more time to respond to your request. When we receive your request pursuant to the CCPA, we will need to verify that you are the California resident about whom the request is directed. Wherever feasible, we will try to verify your identity without requesting additional Personal Information. However, in order to verify your identity, it may be necessary for us to request additional information from you, in which we will contact you in the manner you specified. Pursuant to the CCPA, our response will cover the 12-month period preceding our receipt of your request.

You have a right not to receive discriminatory treatment by the Company for the exercise of privacy rights conferred by the CCPA.

#### SB 27: "SHINE THE LIGHT" LAW

In addition, under California Law SB 27, California residents have a right to receive once per year, from businesses with whom they have an established business relationship, the types of Personal Information that the business shared with third parties for the third parties' direct marketing purposes during the immediately preceding calendar year, and the identities of the third parties with which the business shared information. To request such information from us, please send an e-mail to [Info@2238market.com](mailto:Info@2238market.com), or a written request by mail to Kat Hardin, 850 7<sup>th</sup> Street, San Francisco, CA 94107, and include the phrase "California Privacy Request – SB 27" in the subject line and provide us with your name, mailing address and e-mail address. Allow thirty (30) days for a response.

#### CALIFORNIA "DO NOT TRACK" DISCLOSURES

California law requires us to indicate how our Website and Systems respond to "Do Not Track" settings that may be offered by your web browser. "Do Not Track" is a browser mechanism that enables individuals to signal their preference regarding the collection of personally identifiable information about an individual's online activities over time and across third party websites or online services. We do not alter our practices based on your selection of the "Do Not Track" setting or other "opt out" settings or features that may be offered by your web browser.

#### INTERNATIONAL VISITORS



We process and store all information on computers located in the United States. The laws of the United States may not be as protective of your policy as those in your location. By using the Website or any Systems, you are agreeing to the collection, use, transfer and disclosure of Personal Information and other information in accordance with applicable laws in the United States.

#### UNSUBSCRIBE/OPT-OUT

You may opt-out of receiving any marketing e-mails from us by clicking the “unsubscribe” link in any e-mail we send you. You may also opt-out of marketing information sent via text message by following the procedures specified in the message. However, you cannot opt-out of all e-mails from us, such as communications about your transactions with us.

#### CONTACT US

If you want to review or change your Personal Information we have on file, or if you have questions or concerns regarding this Privacy Policy, please contact us by e-mail at [Info@2238market.com](mailto:Info@2238market.com), or by mail at Kat Hardin, 850 7<sup>th</sup> Street, San Francisco, CA 94107.

If you are a California resident, please refer to the section above entitled “Notice of Your California Privacy Rights” for information regarding your privacy rights and instructions for submitting requests.