



Privacy Policy

At North American Real Estate, including its affiliates ("NARE", "our", "us" or "we"), we are committed to maintaining the confidentiality and privacy of your personal and financial information. The purpose of this Privacy Policy is to explain the types of personal information that NARE collects, how the personal information is obtained, how it is used and the choices that you have regarding our use of, and your ability to review and correct, the personal information we collect about you, among other things.

This Privacy Policy applies to NARE business activities that involve the collection and processing of personal information, including users accessing our website or parties engaging in communications, transactions, or employment with NARE. Please read this Privacy Policy as it provides important information regarding your use of our website, our data and privacy practices, and an explanation of your rights. If you do not agree with this Privacy Policy, please do not access or use the website or otherwise provide us personal information.

Last updated: August 2025

What Personal Information We Collect

The personal information we collect from or about you may include the following:

- **Addresses and other identifiers** – such as name, postal address, email address, phone number, account name, date of birth, Social Security number, driver's license number, photograph, passport number, or other similar identifiers
- **Protected status** – such as citizenship, ethnic background, gender or other similar identifiers
- **Internet or other electronic network activity** – such as browsing history, search history, a consumer's interaction with an internet website, application, or advertisement
- **Financial information** – such as bank account details, credit history, income details or other similar identifiers
- **Commercial information** – such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies or other similar identifiers
- **Education or other professional information**, including veteran status or other similar information
- **Audio or video footage** collected using CCTV cameras (only if you visit one of our premises that uses this technology)
- **Biometric information** – specifically, fingerprints and face and voice recognition

- **Geolocation information**
- **Inferences drawn from personal information** – such as individual profiles, preferences, characteristics, behaviors or other similar identifiers

Whether you choose to provide any particular information requested by NARE is completely your own choice. But, if you choose not to provide the information we request, you may be unable to receive or access certain services, offers and information.

We do not sell or share personal information, as those terms are defined in the California Consumer Privacy Act, as amended ("CCPA").

Purpose for Collection

We may collect your personal information for the following purposes:

- To provide you services, including customer support, processing and fulfilling orders, processing payments, or booking travel arrangements
- To contact you to discuss the services or products you receive from us
- To respond to any questions or concerns you have raised
- To deal with administrative matters such as invoicing, renewal or audit of customer transactions
- To otherwise carry out our obligations arising under our contract with you and to enforce the same
- To comply with legal requirements, including those related to anti-money laundering
- To verify your identity or for other fraud and/or crime prevention purposes
- To monitor safety, fraud, and/or employee theft
- To debug errors in our systems
- For marketing and advertising purposes
- For internal research, analytics and development
- In connection with your application for or employment with us

Retention

We keep your personal information for as long as it is required by us for our legitimate business purposes, to perform our contractual obligations, in connection with your application for or employment with us, in connection with any real estate investment or transaction you are involved in, and in accordance with our data retention schedule. We may retain your personal information for a longer period if doing so is necessary to comply with our legal or reporting obligations, or as otherwise permitted or required by law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors, such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements.

Cookies

Our website functions are based, in part, on your browser's ability to accept cookie files. Cookies are pieces of information that a website transfers to your hard drive that allow you to more easily navigate a website and customize website features that are updated each time you visit a website. Our web servers may automatically recognize a visitor's domain name (such as .com, .edu, etc.), the web page from which a visitor enters our website, which pages a visitor visits on our website and on certain other websites, and/or how much time a visitor spends on each page. We may also use cookies to track you or your online activities over time or across websites. We aggregate this information and use it to evaluate and improve our website, or to support our advertising practices.

You may set your preferences to refuse cookies; however, this may limit your access to some areas of our website. If you have enabled your Internet browser to refuse cookies, we will not collect personal information about you. However, we do not respond to browser do-not-track signals.

Collecting the Personal Information of Minors

Our products and services are not directed to minors under the age of 16 and we do not knowingly collect or sell the personal information of minors.

Your Choices Regarding Direct Marketing

On occasion, we may use your personal information for direct marketing purposes and/or provide your personal information to affiliates for direct marketing purposes. If you do not wish to receive such marketing communications from us, please let us know that you would like to "opt out" by emailing us at privacy@naregroup.com, contacting us at 847-882-0471 or using this webform.

Some email communications from us include instructions on how to stop receiving them. Please follow these instructions if you no longer wish to receive such email messages from us.

Online Advertising

We endeavor, in good faith, to adhere to self-regulatory advertising principles, such as the Digital Advertising Alliance's Principles. If you are interested in learning more about and/or opting out of online behavioral advertising, sometimes called interest-based advertising, we encourage you to visit one of the advertising industry-developed opt-out pages, such as www.youradchoices.com or aboutads.info. Please note that while we provide these links for your convenience, we do not have access to, or control over, these sites' use of cookies or other tracking technologies.

Protecting Your Personal Information

We implement and maintain reasonable data security safeguards appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. Our policy is to restrict access to your personal information to only those employees, service providers and other third parties who need to know that information to provide products or services to you. We maintain commercially reasonable physical, technical, and administrative safeguards consistent with industry standards and other applicable standards as required by law and we require service providers and third parties to do the same.

While we are committed to developing, implementing, maintaining, monitoring and updating a reasonable information security program, unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. Data security incidents and breaches can occur due to vulnerabilities, criminal exploits or other factors that cannot reasonably be prevented. Accordingly, while our reasonable security program is designed to manage data security risks and thus help prevent data security incidents and breaches, it cannot be assumed that the occurrence of any given incident or breach results from our failure to implement and maintain reasonable security. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through the website cannot be guaranteed; and (c) any such information and data may be viewed or tampered with in transit by a third party.

Links to Third-Party Websites

Our websites may contain links to websites operated and maintained by third parties, over which we have no control. Privacy policies on such linked websites may be different from our Privacy Policy. You access such linked websites at your own risk. You should always read the Privacy Policy of a linked website before disclosing any personal information on such website.

Policy Changes

To improve the services we can offer you, and in connection with changes in our business operations, NARE may opt to expand or modify our capabilities for obtaining and processing information, including personal information, about users in the future. NARE will update this Privacy Policy when necessary to ensure that you are aware of developments in this area.

We will post those changes on our websites and update our Privacy Policy so that you will know what information we collect, how we use it and what choices you have. Please be sure to check this page before proceeding to use our websites or provide us personal information. Regardless of any changes we make to our Privacy Policy, we will always use your personal information in accordance with the version of the Privacy Policy in place at the time you provided your information, unless you give your express consent for us to do otherwise or as otherwise permitted or required by applicable law.

Additional Privacy Terms

In conducting business with NARE, in connection with your application for or employment with us, or when using our websites, you may be required to agree to additional written or electronic agreements, including additional privacy terms and conditions ("Additional Privacy Terms"), as a condition to visiting the websites or receiving products, services, employment and/or other information. In the event of any conflict between the Additional Privacy Terms and this Privacy Policy, the Additional Privacy Terms shall prevail but we will treat personal information that you provide to us before we adopt such Additional Privacy Terms in accordance with the terms of this Privacy Policy, unless and until you agree with the application of the Additional Privacy Terms to your personal information collected by us prior to the updates or amendments or as otherwise permitted or required by applicable law.

Your Feedback

To help us improve our Privacy Policy and practices, please give us your feedback by emailing us at privacy@naregroup.com, contacting us at 847-882-0471 or using this webform.

California Privacy Rights and Disclosures

This California Privacy Rights and Disclosure section addresses legal obligations and rights specified in the California Consumer Privacy Act, or CCPA, as amended. For the purposes of this section (California Privacy Rights and Disclosures), personal information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household. If you need access to this privacy policy in a different format for accessibility reasons, please contact us at privacy@naregroup.com.

These obligations and rights apply to businesses doing business in California and to California residents and information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with California consumers or households. It does not include deidentified or aggregate information, publicly available information, or lawfully obtained, truthful information that is a matter of public concern.

Categories of Personal Information We Collect

Address and other identifiers – such as name, postal address, email address, phone number, account name, date of birth, Social Security number, driver's license number, photograph, passport number, or other similar identifiers

NOTE: The information in this category may include the following elements of Sensitive Personal Information: social security number, driver's license number, state identification card number, and/or passport number.

Sources from which PI is/was collected:

- Directly from you

- Automatically when you use our Site or services
- From third parties; including business partners, your employer and background/credit check providers
- Publicly available sources

Purpose of collection:

- To provide you services
- To contact you to discuss the services or products you receive from us
- To respond to any questions or concerns you have raised
- To deal with administrative matters such as invoicing, renewal or to audit customer transactions
- To perform services on our behalf, such as customer service, processing or fulfilling orders, and processing payments
- To otherwise carry out our obligations arising under our contract with you and to enforce the same
- To carry out anti-money laundering and other compliance checks and controls
- To verify your identity or for other fraud and/or crime prevention
- To debug errors in our systems
- For marketing and advertising purposes
- For internal research, analytics and development
- In connection with your application for or employment with us

Categories of entities with whom PI was disclosed:

- Professional advisers, including accountancy and legal firms, in order to provide us with advice and services
- Service providers, including to provide and support our data management, analytics, security, background and credit checks, payroll and benefits, and storage systems
- Group companies, for business and operational purposes
- Transaction (merger and acquisition) partners, including to facilitate the diligence, negotiation, and completion phases of transactions contemplated by us, our parent company, or affiliated operating companies
- Government authorities or other entities with legal authority to request the information

Your California Privacy Rights

a. Your Right to Request Disclosure of Information We Collect and Disclose about You

If you are a California resident, the CCPA grants you the right to request certain information about our practices with respect to personal information. In particular, you can request the following:

- The categories of your personal information that we've collected
- The specific pieces of your personal information that we've collected
- The categories of sources from which we collected your personal information

- The categories of your personal information that we've sold or disclosed for a business purpose
- The business or commercial purposes for which we collected, sold, or shared your personal information
- The categories of third parties to whom we've disclosed your personal information

To exercise your CCPA right to request this information, either email us at privacy@naregroup.com, contact us at 847-882-0471 or use this webform. These requests for disclosure are generally free.

b. Your Right to Request the Deletion of Personal Information

Upon your request, and subject to certain exceptions, we will delete, and direct applicable service providers to delete, the personal information we have collected about you.

To exercise your right to request the deletion of your personal information, either email us at privacy@naregroup.com, contact us at 847-882-0471 or use this webform. These requests for deletion are generally free.

c. Your Right to Ask Us Not to Sell or Share Your Personal Information

We do not, and will not, sell or share your personal information.

d. Your Right to Request the Correction of Your Personal Information

Upon your request, and subject to certain limitations, we will correct any inaccurate personal information we maintain about you.

To exercise your right to request the correction of your personal information, either email us at privacy@naregroup.com, contact us at 847-882-0471 or use this webform. These requests for correction are generally free.

e. Our Use or Disclosure of Sensitive Personal Information

We only use and disclose Sensitive Personal Information for the purposes set forth in Section 7027(m) of the CCPA regulations.

f. Our Support for the Exercise of Your Data Rights

We are committed to providing you control over your personal information. If you exercise any of these rights explained in this section of the Privacy Policy, we will not disadvantage you. You will not be denied or charged different prices or rates for goods or services, provided a different level or quality of goods or services, or subjected to adverse employment actions.

g. How We Will Handle a Request to Exercise Your Rights

For requests for access or deletion, we will first acknowledge receipt of your request. We will provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request under certain circumstances. If we expect your request is going to take us longer than normal to fulfil, we'll let you know.

When you make a request to access, correct, or delete your personal information, we will take steps to verify your identity. These steps may include asking you for personal information, such as your name, address, or other information we maintain about you. If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of the denial.

You may also designate an authorized agent to submit requests on your behalf. If you do so, you will be required to verify your identity by providing us with certain personal information as described above. Additionally, we will also require that you provide the agent with written permission to act on your behalf, and we will deny the request if the agent is unable to submit proof to us that you have authorized them to act on your behalf.

European Privacy Rights and Disclosures

This European Privacy Rights and Disclosure section addresses legal obligations and rights specified in the EU General Data Protection Regulation and the UK General Data Protection Regulation (together, "GDPR"). These obligations and rights apply to individuals who are located in the European Economic Area ("EEA") and the United Kingdom ("UK" and, together with the EEA, "Europe"). This section describes the policies and procedures followed by NARE regarding the collection, use and disclosure of your personal data when you visit the website, or otherwise interact with NARE. For the purposes of this section (European Privacy Rights and Disclosures), personal data means any information relating to an identified or identifiable natural person, either directly or indirectly.

According to the GDPR, North American Real Estate is the controller of your personal data.

a. Collection of Your Personal Data

When you visit the website, receive services from us or otherwise interact with us, we may collect the following personal data about you: your name, postal address, email address, phone number, account name, date of birth, Social Security number, driver's license number, photograph, passport number, employer, job title, bank account information, financial information such as your income and net worth, risk tolerance and transaction history, details about your real estate investment activity or portfolios and information about your transactions with us such as the investment amount and any contributions and/or distributions, as well as any other information you choose to provide to us.

Where NARE carries out background checks on certain individuals for a business purpose, this may involve the processing of data relating to criminal convictions and offences. This data will only be processed where such processing is specifically required or authorized by law.

b. Use of Your Personal Data

We may use the personal data you give us to carry out the following purposes:

Purpose	Lawful Basis
To contact you and to respond to your requests and enquiries when you contact us, or subscribe to receive email alerts	We have a legitimate interest to respond to your requests and enquiries for ongoing business administration
To deliver services to you	To manage and perform our contract with you
For recruitment purposes	We have a legitimate interest to consider an applicant for a role or vacancy in accordance with our recruitment process
To send you our newsletter/bulletin or any other direct marketing information	Where we have received your consent
For business administration, including statistical analysis	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient
To personalize your visit to the website and to assist you while you use the websites	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient
To improve the website by helping us understand who uses the websites	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient
For fraud prevention and detection and to comply with applicable laws, regulations or codes of practice	To comply with our legal obligations

You have the right to object to processing of your personal data where that processing is carried out for our legitimate interest.

c. Sharing Your Personal Data

We may share your personal information with others, but only in certain limited situations, including: (i) within our corporate group or among our affiliated entities, all of which follow this Privacy Policy or equivalent privacy policies; (ii) with our service providers or other parties who agree to keep your personal information confidential and use it only on behalf of NARE; (iii) if your real estate investment is transferred from your current custodian to another custodian, we provide your contact details, tax identification number and other personal information contained within transfer documents to the new custodian on your behalf; and (iv) as otherwise agreed by you. Third parties with whom we share your personal information are bound to comply with similar and equally stringent undertakings of privacy and confidentiality.

In some cases, we may be required to disclose certain personal information to comply with legal or regulatory obligations; to comply with the charter of the applicable entity into which you

invest; to detect and protect against fraud, or any technical or security vulnerabilities; for an investigation or a legal process, such as a court order or subpoena; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to the website, our businesses, or the public. In addition, NARE may disclose certain personal information to any third party that acquires, or is interested in acquiring, all or part of NARE's assets or shares, or that succeeds NARE in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise.

d. International Transfers

When you are based in Europe, personal data collected from you, including via the websites may be transferred to certain recipients located outside Europe, which do not provide a similar or adequate level of protection to that provided by countries in Europe, including the United States. Where we transfer your personal data outside Europe, we will do so on the basis of appropriate safeguards, such as contractual safeguards.

e. Rights of Individuals

You may have certain data privacy rights which may be subject to limitations and/or restrictions. These rights include the right to: (i) request access to and rectification and erasure of your personal data; (ii) obtain restriction of processing or to object to processing of your personal data; and (iii) ask for a copy of your personal data to be provided to you, or a third party, in a digital format. You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority. If you would like to exercise any of these rights, please feel free to email us at: privacy@naregroup.com.

Contact Information:

- Email: privacy@naregroup.com
- Phone: 847-882-0471

Name (required)

Phone Number (required)

Email (required)