



PRIVACY NOTICE

Effective Date: May 2, 2023

This Privacy Notice describes how Verdad Real Estate Inc. ("Verdad", "our", or "we") collects, uses, shares, and protects your personal information when you interact with our website (verdad.com), communications we send, our social media, or our offline services (the "Services"). This Privacy Notice explains the following:

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Please note this Privacy Notice does not apply to non-Verdad websites or services that state they are offered under a different privacy notice. Please review the privacy notices on those websites and services directly to understand their privacy practices.

For questions about our privacy practices, contact us at:

Verdad Real Estate Inc.
1211 S White Chapel Blvd.
Southlake, Texas 76092
info@verdad.com

1. **THE INFORMATION WE COLLECT**

Depending on the nature of your interaction with Verdad, we may collect personal information as follows:

a. Directly from you, when you provide information to us or interact with us or our affiliates:

- *Investor information*, such as name, physical address, contact information, date of birth, Social Security number, investment history, and financial account information to administer investments, and password to establish an account login..
- *Contact information*, including your name, email address, telephone number, and any other information you choose to include when you communicate with us via email, mail, telephone, or other channels.
- *Transactional information*, such as financial account information and transaction history to facilitate transactions.

- *Client and tenant information*, such as name, physical address, contact information, tax identification number (Social Security number of Employer Identification Number) to manage our relationship and provide the Services.
- *Applicant information*, such as your name, contact information, employment history, and educational history if you apply for employment with Verdad.

Please note some of this information may be collected by external parties on our behalf. For example, we use a payment processor when you engage in a transaction with Verdad. Verdad does not itself collect or store financial information.

- b. Automatically from you**, we collect *device information and online user activity* when you utilize or interact with our Services as described in the next section.

2. COOKIES AND INFORMATION COLLECTED BY AUTOMATED MEANS

When you interact with our Services, certain information about you is automatically collected via cookies and similar technologies (referred to collectively herein as "cookies"). Cookies are small text files that are stored within your device's memory by a website. Cookies enable a website such as ours to keep track of your activities to improve user experience and ensure the security of our Services. As you use our Services, the following information is automatically collected from you:

- *Usage details* about your interaction with our Services, such as which pages you access, frequency of access, what you click on, search terms, date and length of visit, and referring website addresses.
- *Device information*, including the IP address and other details of a device that you use to connect with our Services, such as device type and unique device identifier, hardware model, operating system, browser, mobile network information, mobile carrier, and the device's telephone number.
- *Location information* where you choose to provide us with access to information about your device's location.

Much of this information is collected through cookies operated by our partners who assist us in serving ads or other services. For example, we use Google Analytics to conduct analytics and to collect information about usage details. You can learn more about privacy and Google Analytics by visiting <https://support.google.com/analytics/answer/6004245>. You may prevent your data from being collected and used by Google Analytics by opting out through the use of the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout>. We use Google Analytics in restricted data processing mode.

Please note we may use other cookies for the above described purposes. You may be able to opt out of tracking by cookies or control how information collected by cookies is being used via a number of means, as described in [Your Privacy Choices](#). Your browser or device may include "Do Not Track" functionality; please note that we do not respond to such signals. However, our Services are designed to honor Global Privacy Control signals.

3. HOW WE USE YOUR INFORMATION

Verdad may use your information for any of the following purposes:

- *Provide our Services to you*, including to maintain your profile, manage your transactions and projects, and provide information or other important notices.

- *Manage your investments*, including to perform investor servicing functions, manage our relationship with you, update and maintain records, and issue distributions.
- *Respond to your inquiries*, questions, and other requests, and provide support.
- *Improve our Services and grow Verdad*, understand our client and investor base, conduct market research and statistical analysis, understand the effectiveness of our marketing, and develop new projects.
- *Send you marketing materials* we feel may be of interest to you.
- *Offer and maintain the Services*, monitor performance of the Services, ensure the security of the Services, diagnose and fix technology problems, and conduct analytics on your use of the Services.
- *Comply with legal and regulatory obligations*, establish, protect, or exercise our legal rights, defend against legal claims or demands, and detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.
- *Recruit and evaluate job candidates*.

Verdad may also use and share in an aggregate or de-identified manner information at our discretion, including for research, analysis, marketing, and improvement of the Services.

4. HOW WE SHARE YOUR INFORMATION

Verdad may share information as follows:

- *With service providers* that we believe need the information to perform a technology, business, or other professional function for us such as billing, IT services, maintenance and hosting, payment processors, accounting, auditing, and tax services, and other professional services.
- *With analytics partners* who collect information via tracking technologies on our Services to assist us with measuring visits and traffic on our Services so we can measure and improve the performance of the Services.
- *With affiliates* and other entities in our corporate family to provide the Services and for purposes consistent with this Privacy Notice.
- *When required by law* and when we are legally required to do so, such as in response to or in compliance with court or regulatory agency orders, legal proceedings, or legal process, to exercise our legal rights, to defend against legal claims or demands, or to comply with the requirements of any applicable law.
- *To prevent harm* or if we believe it is necessary in order to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.
- *As part of a business transaction* with another entity or its affiliates or service providers in connection with a contemplated or actual merger, acquisition, consolidation, change of control, or sale of all or a portion of our assets, or if we undergo bankruptcy or liquidation. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Notice.

5. HOW WE PROTECT AND STORE INFORMATION

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf. If you use our Services outside of the United States, you understand that we may collect, process, and store your personal information in the United States and other countries.

6. RETENTION OF YOUR INFORMATION

We will retain your personal information for as long as is necessary to complete the purposes for which it was collected, or as may be required by law.

California law requires us to provide information regarding the criteria we use to determine the length of time for which we retain personal information. We utilize the following criteria to determine the length of time for which we retain information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or as otherwise necessary to investigate theft or other activities potentially in violation of our policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety;
- The privacy impact of ongoing retention on the consumer; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

7. YOUR PRIVACY OPTIONS

You may have certain choices when it comes to how we collect and use your information as follows:

- *Update and view your profile:* You can access your investor or Open Book profile at any time to update and view your personal information.
- *Unsubscribe from marketing communications:* If you no longer wish to receive marketing communications from us, you can click the unsubscribe link at the bottom of any email from Verdad.
- *Change or view your cookie preferences:* You have several options to either prevent our collection of information regarding your online activity:
 - If your browser offers you the ability to use the Global Privacy Control (GPC) to communicate your privacy preferences to us, we honor such signals.
 - You also modify your browser setting to disable or reject cookies across the internet; but if you do so, some features of our Services may not function properly or be available.

8. CHILDREN'S INFORMATION

We do not knowingly or intentionally gather personal information about children. If we have inadvertently collected the personal information of a child, a parent or guardian of that child may contact us at info@verdad.com to request that we delete the information from our records or otherwise cease the use of that information in accordance with applicable law.

9. UPDATES

We may make changes to this Privacy Notice from time to time. The "Effective Date" at the top of this page indicates when this Privacy Notice was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Privacy Notice.

10. CALIFORNIA RESIDENTS

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of personal information, rights to access, delete, correct certain personal information we collect about them, restrict us from "selling" or "sharing" certain personal information, and limit our use of sensitive personal information, as defined by the law and described in the categories below. These rights apply to all residents of California, regardless of whether you are an investor, website visitor, or business contact. As a California resident, you have a right not to receive discriminatory treatment for the exercise of your privacy rights.

The following chart describes our practices with regard to the collection, use, and retention of your personal information. The categories we use to describe the information are those listed in the CCPA. Certain personal information may fall into multiple categories, and in some circumstances, how we use and how long we keep the information within each category will vary. The examples of personal information listed below are illustrative and do not represent a complete description of the information we process.

Category	Required Information
Personal Identifiers	<p><u>Examples of what we collect:</u> Name, email address, phone number, address, unique identifiers (such as those assigned in cookies).</p> <p><u>Sources:</u> Directly from you; analytics partners.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain personal identifiers are maintained throughout our relationship with you in order to provide the Services. When you are no longer a client or investor we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.</p>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<p><u>Examples of what we collect:</u> Social Security number, address, telephone number, financial account information.</p> <p><u>Sources:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain personal identifiers are maintained throughout our relationship with you in order to provide the Services. When you are no longer a client we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.</p>
Commercial information	<p><u>Examples of what we collect:</u> Transaction information, payment records, investment history.</p> <p><u>Sources:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p>

	<u>Retention Considerations:</u> The law requires us to maintain records for a period of time, which varies by state.
Internet or other similar network activity	<u>Examples of what we collect:</u> Unique identifier, cookie or tracking pixel information, device ID, browsing history, search history, IP address, interaction with a website. <u>Sources:</u> Automatically from you; analytics partners. <u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information. <u>Retention Considerations:</u> Internet or other similar network activity is typically deleted at regular intervals when the information is no longer necessary for the purpose for which it was collected.
Sensitive information	<u>Examples of what we collect:</u> Social Security number, account log-in information. <u>Sources:</u> Directly from you. <u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information. <u>Retention Considerations:</u> Certain personal details about you are maintained throughout the life of our relationship in order to provide the Services.

Verdad does not collect the following categories listed in the CCPA: protected classifications, biometric information, geolocation, professional or employment information, education information, sensory information, or inferences.

Sale, Sharing, and Other Disclosure of Personal Information

Any category of personal information listed in the chart above may be disclosed for a business purpose to service providers and contractors, which are companies or individuals that we engage to conduct activities on our behalf. Service providers and contractors are restricted from using personal information for any purpose not related to our engagement.

The CCPA also requires us to provide you with information regarding the parties to whom we “sell” or “share” your information, and the parties to who we disclose your information for a business purpose. Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. A company may be considered a third party either because the purpose for its sharing of personal information is not for an enumerated business purpose under the CCPA, or because its contract does not restrict it from using personal information for other purposes. We do not “sell” or “share” your personal information.

We may disclose your information in other ways that are not considered sales under the law. Please see “How We Share Your Information” above for more information about how we share your information.

Right to Access, Correction, and Deletion

You have the right to request access to personal information collected about you and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request we correct inaccurate Personal information and to request, in certain circumstances, that we delete any Personal information that we have collected directly from you.

You may submit a request to exercise your rights to know/access, correct, or delete your personal information by emailing us at info@verdad.com or by calling us at 817.912.0222. You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

In order to process your request, we must verify your request. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email account stated in the request. We may have a reason under the law why we do not have to comply with your request,

or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Right to Opt Out of Sale/Sharing

We do not sell or share your personal information and therefore do not offer an option to opt out.

Right to Limit Use of Sensitive Personal Information

We only process sensitive personal information for such purposes and therefore do not offer an option to limit further processing of sensitive personal information.