

PRIVACY POLICY

N.E. Property Management, LLC, including its affiliates (“NEPM”, “our”, “us” or “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 NEPM collects, how the personal information is obtained, how it is used and the choices that you have regarding our use of, and your rights regarding the personal information we collect.

Unless otherwise provided, this Privacy Policy applies for all business activities involving NEPM, including users accessing our website or parties engaging in communications or transactions with NEPM. By using our website or providing your personal information to us after receiving a copy of this Privacy Policy, you are giving your consent to the provisions of this Privacy Policy. If you do not agree with this Privacy Policy, do not access or use the website.

Last updated: May 2020

1. **Personal Information Collected**

The personal information we collect may include your name, postal address, email address, phone number, account name, date of birth, Social Security number, driver’s license number, photograph, passport number, gender, ethnic background, employer, job title, bank account information, financial information such as your income and net worth, risk tolerance and transaction history, details about your investment activity or retirement 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. Providing any information requested by NEPM is completely your own choice.

2. **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.

3. **Types of Information Collected**

Our website is based on your browser's ability to accept cookie files. Cookies are 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, the web page from which a visitor enters our website, which pages a visitor visits on our website and on certain other websites, and how much time a visitor spends on each page. We, or third parties, 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.

4. **Direct Marketing; Advertising Principles**

On occasion, we may send you email communications about our company and our products. If you change your mind about receiving marketing communications from us and wish not to receive further marketing communications from us, please let us know that you would like to “opt out” by emailing us at privacy@nemanagement.net or contacting us at 1-972-833-4350. Email communications from us may include instructions on how to stop receiving them. Please follow these instructions or opt-out as provided herein if you no longer wish to receive email messages from us.

We attempt, in good faith, to adhere to self-regulatory advertising principles, such as the Digital Advertising Alliance's (DAA) Principles. If you are interested in learning more about it or opting out of online behavioral advertising, we encourage you to visit any of the advertising industry-developed opt-out pages.

5. Protecting and Retention of Your Personal Information

We implement reasonable security appropriate to 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 safeguards as required by law and we require service providers and third parties to do the same.

While we strive to protect your personal information, unfortunately, no data transmission over the internet or any wireless network is guaranteed to be 100% secure. Data security incidents and breaches 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, 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, you acknowledge that: (i) there are security and privacy limitations which are beyond our control; (ii) the security, integrity, and privacy of all information and data exchanged between you and us through the website cannot be guaranteed; and (iii) any such information and data may be viewed or tampered with in transit by a third party.

We keep your personal information for as long as it is required by us for our legitimate business purposes, to perform our contractual obligations, or as is required by law which apply to us. While we generally retain information about you throughout the life cycle of any investment you are involved in and for no longer than we need it, some personal information may be retained after your relationship with us ends.

6. Third-Party Website Links and Social Network Access

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. Accessing such linked websites at your own risk. You should always read the Privacy Policy of a website before disclosing any personal information on such website.

Some of our online services may allow you sign into and associate your social network accounts with us, including, but not limited to, Twitter, LinkedIn, Facebook, YouTube, Instagram, and Pinterest. If you would like to disconnect a social media account from us, refer to the settings of that social media account and its provider.

7. Revisions to Our Privacy Policy

We may at any time revise our Privacy Policy by updating this page. You are bound by any such revisions and should therefore periodically visit our privacy policy before proceeding to use our websites. 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.

8. How to Contact Us

If you have any questions about this Privacy Policy, or you want to obtain more information about our privacy practices, please contact us at: privacy@nemanagement.net or at 1-972-833-4350.

9. California Consumer Privacy Act (CCPA)

This section addresses legal obligations and rights specified in the California Consumer Privacy Act, or CCPA. 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, device or household. If you need access to this privacy policy in a different format for accessibility reasons, please contact us at privacy@nemanagement.net.

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, or public information lawfully available from governmental records.

The following chart describes the categories of personal information we may collect or have collected about you in the past 12 months and, for each category, where and why we collect it, and the categories of entities with which we share or sell the personal information, if any:

Type of Personal Information (PI)	Sources of PI collection	Purpose of collection	Entities with whom PI is shared
<p>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.</p>	<ul style="list-style-type: none"> • Directly from you; • Automatically when you use our Site or services; • From third parties; including business partners, your employer and background/credit check providers; and • Publicly available sources 	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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 and storage systems; • Our 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; and • Government authorities or other entities with legal authority to request the information.

		<p>with you and to enforce the same;</p> <ul style="list-style-type: none"> • 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; and • For internal research, analytics and development. 	
<p>Protected status – such as citizenship, ethnic background, gender or other similar identifiers</p>	<ul style="list-style-type: none"> • Directly from you; • From third parties; including business partners, your employer and background/credit check providers; and • Publicly available sources 	<ul style="list-style-type: none"> • 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; • To perform services on our behalf; • To otherwise carry out our obligations arising under our contract with you and to enforce the same; 	<ul style="list-style-type: none"> • 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 and storage systems; • Our 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; and • Government authorities or other entities with legal authority to request the information

		<ul style="list-style-type: none"> • To carry out anti-money laundering and other compliance checks and controls; and • To verify your identity or for other fraud and/or crime prevention 	
Unique and online identifiers – such as IP address, device IDs or other similar identifiers	<ul style="list-style-type: none"> • Automatically when you use our Site or services 	<ul style="list-style-type: none"> • To debug errors in our systems; • For marketing and advertising purposes; and • For internal research, analytics and development 	<ul style="list-style-type: none"> • Our companies, for business and operational purposes
Financial information such as bank account details, credit history, income details or other similar identifiers	<ul style="list-style-type: none"> • Directly from you; • From your employer; • Automatically when you use our Site or services; • From third parties acting on your behalf; including business partners, accountancy and law firms; and • Background/credit check providers 	<ul style="list-style-type: none"> • To provide you services; • To deal with administrative matters such as invoicing, renewal or to audit customer transactions; • To perform services on our behalf, such as 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; and • To verify your identity or for other 	<ul style="list-style-type: none"> • Professional advisers, including accountancy and legal firms, in order to provide us with advice; • Service providers, including to provide and support our data management, analytics, security, and storage systems; • Our companies, for business and operational purposes; • Transaction partners, including to facilitate the diligence, negotiation, and completion phases of transactions contemplated by us, our parent company, or affiliated operating companies; and • Government authorities or other entities with legal authority to request the information.

		fraud and/or crime prevention	
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	<ul style="list-style-type: none"> • Directly from you; • Automatically when you use our Site or services; • From third parties acting on your behalf; including business partners and law firms; and • Through publicly available sources 	<ul style="list-style-type: none"> • To provide you services; and • To otherwise carry out our obligations arising under our contract with you and to enforce the same 	<ul style="list-style-type: none"> • Professional advisers, including background/credit check, accountancy and legal firms, in order to provide us with advice and services; • Our companies, for business and operational purposes; • Transaction partners, including to facilitate the diligence, negotiation, and completion phases of transactions contemplated by us, our parent company, or affiliated operating companies; and • Government authorities or other entities with legal authority to request the information
Education or other professional information, including veteran status or other similar identifiers	<ul style="list-style-type: none"> • Directly from you; • From your employer; and • Through publicly available sources 	<ul style="list-style-type: none"> • To provide you services; and • To otherwise carry out our obligations arising under our contract with you and to enforce the same 	<ul style="list-style-type: none"> • Our companies, for business and operational purposes; • Transaction partners, including to facilitate the diligence, negotiation, and completion phases of transactions contemplated by you, us, our parent company, or affiliated operating companies; and • Government authorities or other entities with legal authority to request the information
Audio or video footage collected using CCTV cameras (only if you visit one of our premises that uses this technology)	<ul style="list-style-type: none"> • From the use of our CCTV cameras. Where we have cameras on our premises, your image and movements may be recorded. 	<ul style="list-style-type: none"> • To monitor safety, fraud, employee theft, and crime prevention; and • To adhere to requirements imposed by certain Gaming Boards 	<ul style="list-style-type: none"> • Our companies, for business and operational purposes; and • Government authorities or other entities with legal authority to request and for us to provide the information

<p>Biometric information</p>	<ul style="list-style-type: none"> • Directly from you; 	<ul style="list-style-type: none"> • To carry out required compliance checks and controls; • For time-keeping purposes; and • To verify your identity or for other fraud and/or crime prevention 	<ul style="list-style-type: none"> • Our companies, for business and operational purposes; and • Government authorities or other entities with legal authority to request and for us to provide the information
<p>Geolocation Information</p>	<ul style="list-style-type: none"> • Directly from you; and • Automatically when you use our corporate issued devices 	<ul style="list-style-type: none"> • 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 otherwise carry out our obligations arising under our contract with you and to enforce the same 	<ul style="list-style-type: none"> • Our companies, for business and operational purposes
<p>Inferences drawn from CCPA PI – such as individual profiles, preferences, characteristics, behaviors or other similar identifiers</p>	<ul style="list-style-type: none"> • Directly from you; • Automatically when you use our Site or services; and • From third parties, including, business partners or firms acting on your behalf 	<ul style="list-style-type: none"> • 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; • To perform services on your 	<ul style="list-style-type: none"> • Transaction partners, including travel agents; and • Our companies, for business and operational purposes

		behalf, such as booking travel arrangements; <ul style="list-style-type: none"> • To otherwise carry out our obligations arising under our contract with you and to enforce the same; • For marketing and advertising purposes; and • For internal research, analytics and development 	
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In the past 12 months, we have not sold your PI to any third party, and we do not and will not sell PI to third parties within the meaning of the California Consumer Privacy Act.

a. Right to Request Disclosure of Personal Information Collected and Shared

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:

- (i) The categories of your personal information collected.
- (ii) The specific pieces of your personal information collected.
- (iii) The categories of sources from which we collected personal information.
- (iv) The business or commercial purposes for which we collected or sold personal information.
- (v) The categories of third parties with which we shared personal information.

You can submit a request to us for the following additional information:

- (i) The categories of third parties to whom we’ve sold personal information, and the category or categories of personal information sold to each.
- (ii) The categories of personal information that we’ve shared with service providers who provide services for us, like processing your bill.

To exercise your CCPA rights with request to this information, either email us at privacy@nemmanagement.net, contact us at 1-972-833-4350. These requests for disclosure are generally free.

b. Right to Deletion of Personal Information

Upon your request, we will delete the personal information we have collected about you, except for situations when that information is necessary for us to: provide you with a product or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; comply with or exercise rights provided by the law; or use the information internally in ways that are compatible with the context in which you provided the information to us, or that are reasonably aligned with your expectations based on your relationship with us.

To exercise your right to request the deletion of your personal information, either email us at privacy@nemanagement.net, contact us at 1-972-833-4350. These requests for disclosure are generally free.

c. Right to Ask Us Not to Sell Your Personal Information; Protection from Discrimination

We do not sell 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 or provided a different level or quality of goods or services.

d. How We Respond to Requests

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 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.

e. Sharing Your Personal Information

We may share your personal information with others in limited situations, including: (i) within our corporate group or among our affiliated entities, all of which follow this Privacy Policy; (ii) with our service providers or other third parties who agree to keep your personal information confidential and use it only on behalf of NEPM; (iii) if your 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.

We may be required to disclose certain personal information to comply with legal or regulatory obligations; to comply with the charter or certificate of formation 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. Further, NEPM may disclose certain personal information to any third party that acquires, or is interested in acquiring, all or part of NEPM's assets or equity, or that succeeds NEPM in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise.

13. General Data Protection Regulation (GDPR); European Privacy Rights and Disclosures

This section addresses legal obligations and rights specified in the General Data Protection Regulation, or GDPR. These obligations and rights apply to individuals who are located in the European Economic Area. This section describes the policies and procedures followed by NEPM regarding the collection, use and disclosure of your personal data when you visit the website, or otherwise interact with NEPM. For the

purposes of this section, **personal data** means any information relating to an identified or identifiable natural person, either directly or indirectly. According to the GDPR, NEPM is the controller of your personal data.

a. Rights of Individuals

You may have certain data privacy rights which may be subject to limitations and 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, email us at: privacy@nemanagement.net.

b. Personal Data Collection

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 investment activity or retirement 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 NEPM 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.

c. Personal Data Use and Sharing

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

Purpose	Lawful Basis
To contact you and respond to your requests when you contact us, or subscribe to receive email alerts	We have a legitimate interest to respond to your requests 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 any direct marketing information	Where we have received your consent
For business administration	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient
To assist you while you use the website and to improve the website	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	To comply with our legal obligations

We may share your personal information with others in limited situations, including: (i) within our corporate group or among our affiliated entities, all of which follow this Privacy Policy; (ii) with our service providers or other third parties who agree to keep your personal information confidential and use it only on behalf of NEPM; (iii) if your 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.

We may be required to disclose certain personal information to comply with legal or regulatory obligations; to comply with the charter or certificate of formation 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. Further, NEPM may disclose certain personal information to any third party that acquires, or is interested in acquiring, all or part of NEPM's assets or equity, or that succeeds NEPM in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise.

When you are based in the European Union (the "EU"), personal data collected from you, including via the websites may be transferred to certain recipients located outside the EU, which do not provide a similar or adequate level of protection to that provided by countries in the EU. You hereby consent to the transfer of your personal data to recipients as described in this Privacy Policy which are located outside of the EU. You may withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.