## PRIVACY POLICY

For purposes of this Policy, the terms "Carter Haston", "Company", "we", "us", and "our" refer to CH Real Estate Services, LLC and all of their respective affiliates, subsidiaries, parents, members, and managers. This privacy policy ("Privacy Policy") describes our privacy practices regarding information we collect from persons or entities ("you" or "your") who access our website or our related mobile applications that may be available for download (collectively, the "Site").

**PURPOSE.** The Privacy Policy describes the types of personal information we may collect from you or that you may provide when you visit the Site and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Privacy Policy applies to information we collect when you visit the Site, in email, text, and other electronic messages between you and the Company. The Privacy Policy also provides information about your data protection rights.

THE SITE IS NOT INTENDED FOR CHILDREN UNDER 16 YEARS OF AGE. THE COMPANY DOES NOT KNOWINGLY SOLICIT OR COLLECT PERSONAL INFORMATION ON THE SITE FROM CHILDREN UNDER THE AGE OF 16. IF YOU ARE UNDER THE AGE OF 16, DO NOT USE OR PROVIDE ANY INFORMATION ON THIS SITE. IF YOU BELIEVE WE MIGHT HAVE ANY INFORMATION FROM OR ABOUT A CHILD UNDER THE AGE OF 16, PLEASE CONTACT US AT privacy@carterhaston.com.

POLICY CHANGES. PLEASE READ THIS ENTIRE PRIVACY POLICY CAREFULLY. The Company strives to help visitors of the Site protect their privacy while using our Site. The Company may amend this Privacy Policy from time to time. Should the Privacy Policy be modified in any way, the new Privacy Policy will be posted to this webpage. The Company may also send registered users of our services a notice that this Privacy Policy has been changed. You are responsible for periodically visiting our Site and this Privacy Policy to check for any changes. Your continued use of this Site and/or services and/or continued provision of personally identifiable information to us after posting of such notice will be subject to the terms of the then current Privacy Policy

TYPES OF INFORMATION COLLECTED. We collect several types of information from and about users of our Site: personally identifiable information and non-personally identifiable information. Personally identifiable information is information that identifies you or can be used to identify or contact you ("Personally Identifiable Information"). We also may collect information that by itself typically cannot be used to identify or contact you, such as demographic information (e.g. age, profession or gender), browser types, domain names, internet service providers, referring/exit pages, date/time stamp, operating system, clickstream data, information about you such as how you use the Site and your communication preferences, and other anonymous statistical data involving the use of our Site ("Non-Personally Identifiable Information").

Personally Identifiable Information we collect may include, but is not limited to: your name, email addresses, postal addresses, postal codes, user Internet Protocol (IP) addresses, social security/insurance number, driver's license number, prior addresses, employers, job titles, income, telephone numbers, credit card information, bank account information and routing numbers, date of birth, gender, age, marital status, user name and password (if you choose to become a registered user of the Site or our products and services), emergency contact information, and other information either desirable or necessary to provide quality services to our customers and visitors. We may also collect information about you such as your use of the Site and communication preferences.

**THIRD PARTY INFORMATION**. We collect information from various third party providers and our Site may provide links to other Web sites ("External Websites") or resources over which the Company does not have control. The collection, use and disclosure of information received from third parties is governed by the privacy policies of the source website where the information was submitted by the user.

## USE OF GOOGLE ANALYTICS AND OTHER TECHNOLOGIES.

Our sites may utilize third party providers like Google, Facebook, and Instagram to deliver advertisements about our communities and services as you browse on their platforms. Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. ("Google"),is used to better assist Company in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer's IP address. That information will be transmitted to and stored by Google. The information will be used to evaluate consumer use of the Site, compiling reports on Site activity for Company's use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. You can learn more about third party "opt-out" options by reviewing the privacy policies of these providers.

HOW WE COLLECT AND USE INFORMATION. We may collect information in several ways through your use of this Site, as well as from forms you submit to us, personal correspondence, such as emails or letters that you send to us, information you include in a form you complete on the Site, or any other activity through which you identify yourself to us. When you visit the Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns including logging your IP address, the URL of your request and other information that is provided in the HTTP header. We may also ask you to voluntarily provide us with personal information on this Site. For example, while many of the features of the Site are available without registering, you may be asked to create an account on the Site if you desire to access certain features. Further, in some instances, we may ask you to provide personal information to perform screening services.

Company uses the information we collect about you or that you provide to us, including personal information to present our website and its contents to you. Company may use the information to fulfill any other purpose for which you provide the personal information. Company may use the information to notify you about changes to our website or any products, services, or features we offer or provide. We may also use your personal information to send you targeted messages, publications, news, and information about events, special offers, promotions and benefits. Company may use the information collected from you to provide services which you have requested from us and may include, but is not limited, to the following business purposes:

- To fulfill or meet the reason you provided the information.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate your concerns and monitor and improve our responses.
- To personalize your Site experience and deliver content, product, and service offerings.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To protect our interests and defend legal rights and claims.
- For purposes disclosed at the time you provide your information or as otherwise set forth in the Policy.

**PUBLIC INFORMATION AND POSTS.** Any information about yourself or others that you post on our social media pages, on platforms like Twitter, Facebook and other chat rooms, blogs and forums, will be viewed by others (including search engines), over whom we have no control. You are responsible for the information you choose to post or otherwise make available in public areas, and you acknowledge that this may be collected and used by third parties.

**SHARING OF INFORMATION COLLECTED.** Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any information we gather from you on our Site. We may share with third parties, including, without limitation, our corporate partners, aggregated demographic and statistical information that is not personally identifiable.

The Company may also disclose an individual's personal information:

To contractors, marketing and advertising partners, data analytic providers, trade
associations, internet service providers, Realpage operating system platform, social
networks, data brokers, and other third parties we use to support our business and are
bound by contractual obligations to keep personal information confidential and use it
only for the business purpose for which we disclose it to them;

- To a person who in the reasonable judgment of Company is seeking the information as a verifiable agent of the individual;
- In situations where sharing or disclosing your information is required to offer you products or services you desire;
- To a third party or parties, where disclosure is required or permitted by law, a judicial proceeding, a criminal investigation, a court order, or legal process;
- If, in the reasonable judgment of Company, it is necessary to enforce compliance with our internal policies or the Terms of Use, to prevent illegal activity or suspected fraud, or to protect our Site, customers, or others; and
- To any other entity that acquires all or a portion of our organization by merger, reorganization, operation of law, or a sale of some or all of Company's assets.

The Company may be required to use or disclose your information in connection with a legal action or other proceeding, including without limitation, in response to a court order or a subpoena/summons. We also may disclose such information in response to a law enforcement agency's request.

HOW WE STORE YOUR INFORMATION. The Company is committed to protecting the security of any personal information you provide to us. We maintain commercially reasonable safeguards to maintain the security and privacy of personal information that you provide to us. In spite of these protections, the Company cannot guarantee the security of any data submitted over the Internet. After your information reaches Company it is protected by procedures and technology designed to block reasonably foreseeable intrusions by unauthorized third parties. We may store and process your personal information in the United States or Canada or any other country in which we or our agents maintain facilities. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk, and we are not responsible for any circumvention of any privacy settings or security measures contained on the Site.

**DATA RETENTION.** To provide you with the products and services you request, answer questions you may have about the products and services provided, and for our own accountability to external regulatory bodies, we retain your information for a period deemed reasonable under the circumstances. Information stored is removed, destroyed, or deleted periodically when it appears we will no longer have a need to contact you. Retention periods may be extended if we are required to preserve your personal data in connection with litigation, investigations and proceedings, or if a longer retention period is required or permitted by applicable law.

**ACCESSING, REVIEWING AND CHANGING YOUR PERSONAL INFORMATION.** You can see, review and change most of your personal information by logging into your account on the Site (if any) or by contacting us at the addresses below. If your personal information changes or is inaccurate, you must change it promptly.

There may be circumstances where your personal information is not accessible, reviewable or able to be modified by you through your account. With some exceptions, you have the right to see what personal information we hold about you. We can help you identify what records we might have about you and we will also try to help you understand any information you do not understand. We may need to confirm your identity before providing you with this access. We may require that your request to us for access be made in writing.

**RIGHTS OF INDIVIDUALS.** Site users who wish to correct, update, change, or erase the information they submit on the Site should be able to go back to the applicable web form or their account to edit their user or organization record. For additional information or problems accessing your information from such page, please contact Company using one of the methods listed below.

If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country.

**CONTACTING US.** If you have questions regarding this Privacy Policy or the use of information collected, please contact us at:

Address: Carter Haston

ATTN Operations Department

1005 17<sup>th</sup> Ave South| Suite 700 | Nashville, TN 37203

Email: privacy@carterhaston.com

Phone: (615) 279-9200

## YOUR CALIFORNIA PRIVACY RIGHTS NOTICE

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. This section specifically applies to California residents. This Notice for California Residents supplements the information contained in the general Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("CA Consumers"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Notice.

• The right to know. You have the right to know what Personal Information we have collected about you, including the categories of Personal Information we have collected, the categories of sources from which we collected it, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclosed Personal Information, and the specific pieces of Personal Information we collected. request that we correct inaccurate Personal Information that we maintain about you.

- The right to correct. You have the right to request that we correct inaccurate Personal Information that we maintain about you.
- The right to deletion. You have the right to request that we delete the Personal Information that we have collected or maintain about you.
- The right to opt out of the sale or sharing. You have the right to opt out of the sale or sharing of your Personal Information.
- The right to equal service. If you choose to exercise any of these rights, we will not discriminate against you in any way. If you exercise certain rights, understand that you may be unable to use or access certain features of the Sites or our services or properties.

## OTHER STATE PRIVACY RIGHTS

If you are a resident of Colorado, Connecticut, Florida, Montana, Oregon, Texas, Virginia, and Utah, you may have the following rights, subject to any applicable exemptions of limitations:

- The right to access. You have the right to confirm whether we are processing your Personal Information under specific circumstances.
- The right to correct. You have the right to request that we correct inaccurate Personal Information that we maintain about you.
- The right to delete. You have the right to request that we delete your Personal Information under specific circumstances.
- The right to opt-out. You have the right to object or opt out of certain types of processing, including (1) processing for the purpose of targeted advertising, (2) processing for the purpose of the sale of Personal Information, (3) processing for the purpose of certain types of profiling and automated decision-making, (4) collection of Sensitive Personal Information, and (5) collection of Personal Information through the operation of voice or facial recognition features.
- The right to data portability. You have the right to request a copy of your Personal Information in an accessible format.
- The right to equal service. If you choose to exercise any of these rights, we will not discriminate against you in any way. If you exercise certain rights, understand that you may be unable to use or access certain features of the Sites or our services or properties.

**INFORMATION WE COLLECT**. The site collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a consumer, household, or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from CCPA's scope protected by other sector-specific federal or California statutes.

Our Site has collected the following categories of personal information in the last twelve (12) months.

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic	Yes

	information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	Yes
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per the Family	Education records directly related to a student maintained by an	No

Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	No

**YOUR RIGHTS AND CHOICES**. If you are a resident of California or one of the states listed above in the "Other State Privacy Rights" section, unless your requests are unfounded, excessive or repetitive, you may exercise your rights free of charge. This section describes your rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights. We are required to notify residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.

You, or an authorized agent, have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - o disclosures of a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights. You, or an authorized agent, have the right to request we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct service providers to delete) your personal information from our records, unless an exception applies.

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

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activities, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public
  interest that adheres to all other applicable ethics and privacy laws, when the information's
  deletion may likely render impossible or seriously impair the research's achievement, if you
  previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

**EXERCISING ACCESS, DATA PORTABILITY, AND DELETION RIGHTS.** To exercise the access, data portability, and deletion rights described above please submit a verifiable consumer request to us by either:

Calling us at (615) 279-9200 Email us at privacy@carterhaston.com Visiting www.carterhaston.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of a minor child.

If the verifiable request for access, data portability, or deletion is made through an authorized agent, we may require that the agent provide:

Written permission from consumer.

Verify the agent's identify with the business.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information. Sufficient information may include name, Driver's License number, Social Security number, address, date of birth, or other identifying information.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

You may make a verifiable consumer request for deletion through a two-step process. The verifiable consumer request must:

- Clearly submit a request to delete
- Separately confirm personal information should be deleted.
- Provide sufficient information to allow us to reasonably verify you are the person about whom we collected the personal information.

We cannot respond to your request and may deny if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

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

**RESPONSE TIMING AND FORMAT**. We endeavor to respond to a verifiable consumer request within forty-five (45) days of receipt. If we require more time, up to a total of 90 days, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine the request warrants a fee, we will tell you why we made the decision and provide you with a cost estimate before completing your request.

Please note we are unable to disclose or provide you with your Social Security Number, Driver's License Number, or other government issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers.

**NON-DISCRIMINATION**. We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**OTHER CALIFORNIA PRIVACY RIGHTS**. California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Site that are California residents to request certain information regarding our disclosure of personal information to third parties for direct marketing purposes.

**CHANGES TO OUR PRIVACY NOTICE**. We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Site. Your continued use of our Site following the posting of changes constitute your acceptance of such changes.

**CONTACT INFORMATION**. If you have any questions or comments about this notice, the ways in which we collect or use the information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us.

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ATTN Operations Department

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Email: privacy@carterhaston.com

Phone: (615) 279-9200