



# Privacy Policy

Updated: February 7, 2024

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This Privacy Policy (“Privacy Policy” or “Policy”) describes information about the categories of personal information collected by Realty Mogul, Co. and its affiliates (“we,” “us,” “our,” or “RealtyMogul”) through this website (“Site”) or obtained in connection with any services provided by us, why we collect it, and the types of entities to whom we may disclose your personal information. We also describe rights you may have with respect to such information. By accessing the Site and/or utilizing any of our Services, as defined below, you agree to our collection and use of personal information as described in this Policy and our [Terms of Service](#), and any other agreements, disclosures, operating rules, policies and procedures that may be, from time-to-time, required by us, delivered to you, or published on the Platform by us, each of which is incorporated by reference and each of which we may update from time to time without notice to you. These Terms of Service are in addition to any agreements between us or any other affiliated or unaffiliated issuer of securities, unless otherwise specified.

This Policy does not include personal information we may collect that is subject to the federal Gramm-Leach-Bliley Act (“GLBA”), which is governed by a separate privacy notice that can be found [here](#).

## **Personal Information We Collect and Purposes For Collection**

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### Website Visitors and Platform Registrants

When you visit or interact with the Site, register to join our Platform, or utilize any of our services (together, our “Services”), we may collect your name, email address, home address, phone number, trust account information, date of birth, IP address, information you report regarding your net worth, account number and password, social security number, and bank account information. We collect this information to provide our Services to you, respond to your inquiries, and for analytics, marketing, and advertising purposes.

We may also collect internet and other electronic activity information associated with your interaction with our Site, including your browser type, and internet service provider (“ISP”); your operating system; which of our web pages you access and how frequently you access them; referral or exit pages; click stream data; and the dates and times that you visit the Site. We collect this information to operate our Site, analyze and improve your experience on our Site, and for advertising purposes.

### User Registration and Utilization of our Services

Using our Services will require you to provide personal data. Such information typically includes, without limitation, your name, email address, home address and phone number, date of birth, social security number and/or tax identification number, employer, and job title. We use this data to enable you to log in to and interact

on the Site, provide you with our Services, guard against potential fraud, and maintain regular communications with you about our Services.

### Financial Data (for Investors)

When you subscribe to make an investment using our Services, we may also collect additional bank information and related information to, among other things, enable issuers of securities products, including issuers unaffiliated with us, and affiliated issuers (“Issuer(s)”), and you to originate funds transfers and make subsequent investment disbursements to you.

### **Cookies and Tracking Technologies**

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We may send one or more “cookies” to your computer. Cookies are small text files placed on your web browser when you visit our Site that store information on your computer, such as your Site preferences. We use cookies when you sign in to keep track of your personal session, including some account identifiers to ensure that you are the only person making changes to your account. We also use cookies to track your activity on the Site as a unique person.

You can set your web browser to inform you when cookies are set, or to prevent cookies from being set altogether. Please note, however, that if you decline to use cookies, you may experience reduced functionality and slower site response times. In some instances, declining to use our authentication-related cookies may prevent you from using the website entirely.

We also allow third parties (including Google and Meta) to use third-party cookies, web beacons, and other storage technologies to collect or receive information about how you interact with our Site and elsewhere on the Internet and use that information to provide analytics and other measurements services, and to deliver and target advertisements tailored to you. Third parties may also use some of these technologies to assist us in determining if you require assistance or are having problems navigating on our Sites or Apps, and this may include technologies that record your interactions with the Services, including without limitation, your keystrokes, mouse clicks, screen touches, and information about when, how, and from where you accessed our Services.

We use Google Analytics to evaluate the use of our website. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit the website, what pages they visit when they do so, and what other websites they visited prior to visiting our website. To learn more about how Google Analytics collects personal information, review [Google’s Privacy Policy](#).

### **How and When Your Information Is Shared With Other Parties**

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If you indicate an interest in making an investment through our Services, we will notify the Issuer of your interest and share your personal information with such Issuer. We may notify other persons with whom you have directed us to share your personal information. By indicating an interest in an investment, you consent to this disclosure of your information to the relevant Issuer. Since we do not have direct control over the policies and practices of

unaffiliated Issuers, including, without limitation, their privacy policies and practices that apply to their collection and processing of your personal information disclosed to them, we are not responsible for their privacy practices.

We may share or provide access to your personal information with vendors we use to assist us in or facilitate the provision of our Services and operation of the Site. We may also transfer or disclose your personal information to a third-party in the event of an actual or proposed sale, merger, reorganization, or restructuring of RealtyMogul.

We may share your information with law enforcement or other government agencies as required or permitted by law or for the purposes of limiting fraud or complying with applicable laws. We reserve the right to disclose your personally identifiable information when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or legal process. We further reserve the right to disclose any of your personal information that we believe, in good faith, appropriate or necessary to take precautions against liability, to investigate and defend against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Site or our Services, or to protect our rights, property or personal safety of our users, issuers, or others.

## **Do Not Track**

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We do not respond to Do Not Track (“DNT”) header signals at this time.

## **Personal Information of Minors**

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Our Services are not directed to minors under the age of 13 and we do not knowingly collect the personal information of minors under 13.

## **How We Keep Your Personal Information Secure**

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We implement and maintain reasonable security measures appropriate to the nature of the personal information that we collect, use, retain, transfer or otherwise process. Those measures include administrative, physical, and technical safeguards to protect the security, confidentiality, and integrity of personal information. However, data security incidents and breaches can occur due to a variety of factors that cannot reasonably be prevented; therefore, our safeguards may not always be adequate to prevent all breaches of security.

## **Other Websites and Social Media Buttons**

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Our Site may contain links to other websites or social media buttons. We are not responsible for the privacy practices or the content of those websites or social media platforms. This Privacy Policy applies only to our business and the personal information we collect.

## **International Users**

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The Site may be accessed by users located outside the United States. If you choose to use the Service from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States, and that by providing your personal information on or through the Site then you consent to that transfer.

## **Changes to This Policy**

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We will review and update this Policy as required to keep current with rules and regulations, new technologies and security standards. We will post those changes on the website or update the “last updated” date of the Privacy Policy. If the changes are material, you will be notified via a notice on our website.

## **Accessibility**

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We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at (877) 977-2776.

## **Contact Us**

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If there are any questions regarding this Policy or to request a copy of this Policy in another format you may contact us using the information below.

### **Realty Mogul, Co.**

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