



PRIVACY POLICY

1. Overview

Investors Associated LLP, IA Management LLC, and their respective affiliates and subsidiaries (collectively “IA,” “we,” “us,” or “our,” as the context requires) respect your privacy and are committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy describes our current policies and practices with regard to information that we may collect from you or that you may provide when you visit <https://investorsassociated.com/>, <https://investors-associate-portal.azurewebsites.net/>, or other websites to which we post this Privacy Policy (each a “Site” and collectively the “Sites”).

This Privacy Policy applies to information that we collect or which you provide to us (i) on or through a Site, (ii) in or through phone, e-mail, text, and other electronic communications directly between you and us on or through the Sites, and (iii) on or through applications, products, functionality, services, or other content offered on or through a Site (the Sites, together with (ii) and (iii), collectively the “Services”).

Please read this Privacy Policy carefully to understand our policies and practices regarding your Personal Information (as defined below) and how we will treat it. By accessing or using the Services or by clicking to accept or agree to this Privacy Policy when this option is made available to you, you agree to be bound and abide by all laws and regulations applicable to your use of the Services, this Privacy Policy and our Cookie Policy (together with this Privacy Policy, the “User Terms”), incorporated herein by reference. If you do not want to agree to the User Terms, your choice is to not access or use the Services and not communicate with us regarding the Services.

Except as expressly provided in this Privacy Policy or as required by applicable law, this Privacy Policy does not apply to information that:

- we collect offline;
- is collected through any applications or websites other than those included in the Services, including websites you may access through or may be linked to by the Services (such as resident or tenant portals operated by third parties); or
- which you provide to or which is collected by any third party.

This Privacy Policy may change from time to time (see below). Your continued use of the Services after we revise this Privacy Policy or the User Terms means you accept this Privacy Policy and the User Terms as amended, so please check this Privacy Policy and the User Terms periodically for updates.

Related offerings with links from the Services may have their own privacy policies. We encourage you to always review the privacy policies of third parties before you provide any Personal Information to third parties.

2. Personal Information

Except as otherwise provided in this Privacy Policy, “Personal Information” is information by which you may be personally identified, or that relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you, such as name, email address, or identification number. “Personal Information” does not include information which is generally not considered “personal information,” “personal data,” or similar terms under applicable law, such as information which is publicly available, or which is subject to special data privacy laws and/or regulations (such as “protected health information” covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA)).



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3. Children's Privacy

The Services are not directed to nor intended for use by anyone under eighteen (18) years of age ("Unauthorized Users"). We do not knowingly collect Personal Information from Unauthorized Users. No Unauthorized Users may use the Services. If you are an Unauthorized User, do not use the Services or provide any Personal Information to, on, or through the Services. If we learn that we have Personal Information on a child under the age of eighteen (18), or equivalent minimum age under applicable privacy laws, we will take steps to delete that information from our systems. If you are a parent or guardian and have concerns that we may have collected Personal Information from your child, please contact us as described below.

4. Information We Collect

We may collect several types of information from and about you via the Services, including:

- Personal Information, such as your:
 - Name;
 - Title;
 - Postal address;
 - Email address;
 - Telephone number; and
 - Any other categories of Personal Information which you otherwise provide to us; and
- Information that is about you but on its own does not identify you ("Non-Personal Information"), including:
 - Information about your internet connection, the equipment you use to access the Services, usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies (collectively, "Usage Details").

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Services. Information collected automatically may include Usage Details and information collected through cookies, web beacons, and other tracking technologies, as described below.
- To the extent permitted by applicable law, from third parties.

5. Information You Provide to Us

The information (including Personal Information) which we collect on or through the Services may include:

- Information that you provide by filling in forms or making other submissions to us through the Services. This may include, but is not limited to, information provided at the time of registering to use the Services or creating an account, signing up for newsletters or other alerts, expressing interest or providing information related to a potential investment, leasing opportunity or other business transaction with IA, or requesting other services. We may also ask you for information when you report a problem with the Services.
- Records and copies of your communications (including contact information involved in such communications such as phone numbers and email addresses), if you contact us.



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- Details of transactions you carry out through the Services and of the fulfillment of your orders, payments, or other transactions.
- Any other information that you otherwise share directly with us.

6. Information We Collect Automatically

As you navigate through and interact with the Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including Usage Details and other Non-Personal Information.

The information we collect automatically is Non-Personal Information and does not include Personal Information. The information we collect automatically helps us to improve the Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize the Services according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the Services.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of the Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Services.
- Flash Cookies. Certain features of the Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on the Services. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.
- Web Beacons. Pages of the Services and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit IA, for example, to count users who have visited those pages or opened an email and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity).
- Analytics. We may utilize third party companies and analytics to help us market, sell, and provide information about our products and services; and we provide your Personal Information to these third parties to assist us in conducting business with you. We may use web analytics tools provided by service providers, including, but not limited to, Google Analytics, which is a third-party service that transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We may use reports provided by Google Analytics or other similar service providers, to help us understand traffic on the Services, and web page usage. For more information concerning Google Analytics and how it collects and processes data please see “How Google Uses Data When You Use Our Partners Web Sites or Apps” located at www.google.com/policies/privacy/partners. We may use the information provided by these tools to improve our services and our online advertisements. These tools place session and persistent cookies in your browser to identify you as a unique user the



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next time you visit, access, or use the Services. Each cookie cannot be used by anyone other than the service provider (e.g., Google Analytics).

At this time, the Services do not recognize automated browser signals regarding tracking mechanisms, such as “do-not-track” instructions. All traffic is treated as equal and processed the same in that we will track users’ use of the Services as well as the webpage that the user came from before reaching the Services and the webpage to which he or she went after leaving the Services.

Third-Party Use of Cookies and Other Tracking Technologies

When you use the Services, certain third parties (including analytics companies) may use automatic information collection technologies to collect information about you or your device. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Services. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see **Choices About How We Use and Disclose Your Information**.

7. Information We Receive from Third Parties

In some cases, we may also receive information from third parties. For example, we may receive information, including Personal Information, from (i) third parties who refer potential investor candidates to us, (ii) property owners who provide us information required to fulfill services which we provide to them, or (iii) our service providers who collect or process information on our or our clients’ behalf.

8. How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present the Services and their contents to you.
- To provide you with information, products, or services that you request from us or our clients.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account with us or your account with our clients.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us or between you and our clients, including for billing and collection.
- To notify you about changes to the Services or any products or services we offer or provide through the Services.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.



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We may also use your information to contact you about our own goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile. For more information, see [Choices About How We Use and Disclose Your Information](#).

9. Disclosure of Your Information

We may disclose Non-Personal Information, aggregated information about our users, and other information that does not identify any individual, without restriction.

We may disclose Personal Information that we collect, or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business, including third parties we use to assist us with marketing our products and services and third parties we use to assist us in providing services to our clients.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of IA's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by IA about the Services users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. For more information, see [Choices About How We Use and Disclose Your Information](#).
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of IA, our customers, or others.

10. Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Services may then be inaccessible or not function properly.
- **Promotional Offers from IA.** If you do not wish to have your Personal Information used by IA to promote our products or services, you can opt-out by checking the relevant box located on the form on which we collect your data or at any other time by logging into the Services and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by contacting us by email as provided below. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.



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We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (NAI) on the NAI's website.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to us by contacting us as provided below. However, please know we do not currently sell data triggering that statute's opt-out requirements.

If you are an individual who is located in the European Economic Area (EEA), please see Section 12 for more information about your rights and choices regarding your Personal Information.

11. Accessing and Correcting Your Information

If you have an account with us, you may be able to review and change certain Personal Information by logging into the Services and visiting your account profile page. You may also contact us as provided below to request access to, correct or delete any Personal Information that you have provided to us. We may deny a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you are an individual who is located in the European Economic Area (EEA), please see Section 12 for more information about accessing or corrections your Personal Information which we hold.

12. Notices for Individuals Located in the EEA

This Section 12 applies exclusively to visitors and users of the Services who are located in the EEA ("Data Subjects").

If you are a Data Subject, you have the following rights:

- The right to request copies of your Personal Information. If you require more than one copy, we may charge you a reasonable fee.
- The right to request that we correct any Personal Information that you believe is inaccurate or complete any Personal Information which you believe is incomplete.
- The right to request that we erase your Personal Information, under certain circumstances.
- The right to request that we restrict the processing of your Personal Information, under certain circumstances.
- The right to object to our processing of your Personal Information, under certain circumstances.
- The right to request we transfer data that we have collected to you or directly to another organization, under certain circumstances.
- The right to withdraw your consent, explicit or otherwise, at any time. If we rely on your consent as the legal basis for our processing of your Personal Information, we will refrain from processing your data.

For the purposes of European data protection laws, IA is the data controller (i.e., responsible for controlling the processing of personal information covered by this Privacy Policy). If you are a Data Subject and would like to exercise any of the foregoing rights, please contact us as described below.

If you are a Data Subject and feel we have not resolved a privacy concern related to personal information processed or transferred by IA, you have the right to submit a complaint to a supervisory authority.



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13. Transfer of Personal Information

The Sites are operated and managed on servers located and operated within the United States. Any information collected through the Services as described in this Privacy Policy may be stored in the United States or any other country in which we or our service providers maintain facilities. The United States is not recognized as having adequate safeguards under European law. If you are located outside of the United States, please note that we may transfer information, including Personal Information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of your Personal Information to the United States as described in this Privacy Policy.

14. Security Measures

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to or on the Services. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

15. Changes to this Privacy Policy

It is our policy to post any changes we make to this Privacy Policy on this page with a notice that this Privacy Policy has been updated on our home page. If we make material changes to how we treat our users' Personal Information, we will notify you by email to the email address specified in your account and/or through a notice on our home page. The date this Privacy Policy was last revised is identified at the top of this page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting the Services and this Privacy Policy to check for any changes.

16. Governing Law and Jurisdiction

Unless otherwise required by applicable law, this Privacy Policy, and IA's collection and use of Personal Information, shall be governed by and interpreted in accordance with the laws of the United States and the state of Wisconsin. Unless prohibited by applicable law, any disputes arising out of this this Privacy Policy or IA's collection and use of Personal Information shall be adjudicated in the federal or state courts with jurisdiction over Waukesha County, Wisconsin.

17. Contact Us

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:

Investors Associated, LLP

Attn: IT Department

810 Cardinal Lane, Suite 100

Hartland, WI 53029

Email: info@investorsassociatedllp.com

Phone: 414-856-7311