

Privacy Policy

Effective as of September 1, 2020.

This Privacy Policy describes how C-III Capital Partners LLC and our subsidiaries and affiliates (collectively "C-III" "we", "us" or "our") collect, use and share personal information when you use our websites (the "Site"), use our digital properties that link to this Privacy Policy including our investor portal located at <https://investors.islandcapital.com/>, use our financial services, participate in our events or activities where this Privacy Policy is posted, receive our marketing communications or engage with us on social networks (collectively the "Service").

In some cases we may provide a different privacy policy for a particular event or service, in which case that privacy policy will apply in accordance with its terms.

We provide important information for California residents [here](#).

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email and mailing addresses, residence, postal code, phone number, professional title, and organizational affiliation.
- **Profile data**, such as your username and password that you set to establish an online account with us, age, gender, biographical details, interests, preferences, information on your execution of certain account-related documents, and information that may be related to a service, account or an event you register for.
- **Identity data**, such as a national identification number (*e.g.*, social security number where permitted, tax identification number, passport number), or state or local identification number (*e.g.*, driver's license or



state ID number), which may be used to conduct Know Your Customer (“KYC”) checks and other screens permitted by law.

- **Communications** that we exchange, including when you contact us with questions, feedback, or otherwise.
- **Financial data**, such as your economic or financial status, financial account details, investment holdings and preferences, and ability to invest.
- **Marketing data**, such as your preferences for receiving communications about our products, services, activities, events, and publications, and details about how you engage with our communications.
- **Other information** that we may collect which is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third party sources. We may obtain personal information from other sources, such as:

- **Data providers**, such as information services and data licensors.
- **Business partners**, such as joint marketing partners and event co-sponsors.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your activity over time on our sites and other sites and online services, such as:

- **Device data**, such as your computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, unique identifiers, the website you visited before browsing to our website, and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.

Cookies and similar technologies. Like many online services, we use the following technologies:

- **Cookies**, which are text files that websites store on a visitor’s device to uniquely identify the visitor’s browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.
- **Flash cookies**, or locally-stored objects, which are used on websites for purposes similar to cookies but allow storage of a larger amount of data.
- **Web beacons**, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.

How we use your personal information

We use your personal information for the following purposes or as otherwise described at the time we collect it:

Service delivery. We use your personal information to:

- provide, operate and improve the Service and our business;
- execute your transactions;



- conduct KYC checks and other screens permitted by law;
- establish and maintain your user profile on the Service;
- enable security features of the Service, such as by sending you security codes via email and remembering devices from which you have previously logged in;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Marketing. We may collect and use your personal information for marketing purposes:

- **Direct marketing.** We may send you C-III-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection:

Affiliates. Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

Service providers. Companies and individuals that provide services on our behalf or help us operate the Service or our business (such as IT, hosting, customer relationship management and support, print and mail fulfillment, data management, event services, email delivery, marketing, website analytics, and providers of background, credit, and other screening services).

Third parties related to the Service. Brokers, custodians, attorneys, auditors, insurers, administrators, investment funds and their respective managers and other non-affiliated third parties as necessary to provide the Service.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and operations purposes](#) described above.

Business transferees. Relevant participants in business transactions (or potential transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, C-III or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Your choices

You have the following choices with respect to your personal information.

Access or update your information. If you have registered for an account with us, you may review and update certain account information by logging into the account.

Opt-out of marketing communications. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). You may continue to receive service-related and other non-marketing emails.

Cookies. Most browsers let you remove and/or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Service and our Site may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org. We use Google Analytics to help us understand user activity and patterns on the Sites. You can learn more about Google Analytics cookies at <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies> and about how Google protects your data at <http://www.google.com/analytics/learn/privacy.html>. You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

Third party platforms. If you choose to connect to the Service through your social media account, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third party platform, that choice will not apply to information that we have already received from that third party.

Other sites and services

The Service may contain links to websites and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or other online services that are not associated with us. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Service is not intended for use by children under 16 years of age. If we learn that we have collected personal information from a child under 16 without the consent of the child's parent or guardian as required by law, we will delete it.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

How to contact us

You can reach us in the following ways:

- **Email:** privacy@c3cp.com
- **Mail:** C-III Capital Partners LLC, 717 Fifth Avenue, 18th Floor, New York, NY 10022
- **Phone:** 866-209-7628

Important information for California residents

Scope. This section applies only to California residents. It describes how we collect, use and share Personal Information of California residents when we act as a “business” as defined under the California Consumer Privacy Act of 2018 (“CCPA”), and their rights with respect to their Personal Information. For purposes of this section, “**Personal Information**” has the meaning given in the CCPA, but does not include information exempted from the scope of the CCPA (such as information that is governed by the federal Gramm-Leach-Bliley Act or the California Financial Information Privacy Act) or information we collect from you in the course of providing services to you or receiving services from you where you are an employee, controlling owner, director, officer or contractor of a company, partnership, sole proprietorship, non-profit or government agency. In some cases we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

Your California privacy rights. As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom we share Personal Information.
 - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information disclosed to each category of third party recipient.
 - Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-in.** If we know that you are younger than 16 years old, we will ask for your permission (or if you are younger than 13 years old, your parent's or guardian's permission) to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination in the form of legally prohibited increases in the price or decreases in the quality of our Service.

How to exercise your rights

You may exercise your right to information, access or deletion by:

- visiting www.c3cp.com/ccpa-request-form
- calling us toll free at 866-209-7628
- emailing privacy@c3cp.com

We reserve the right to confirm your California residency to process your requests and will need to confirm your identity to process your requests to exercise these rights. Government identification may be required. You may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government-issued identification, and the authorized agent's valid government issued identification. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Personal information that we collect, use and disclose

The chart below describes the Personal Information we collect by reference to the categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal



information not described below. Each category is used for the business/commercial purposes described in the section above entitled [How we use your personal information](#), and disclosed to the categories of third parties described in the section above entitled [How we share your personal information](#).

We have not sold your personal information in the preceding 12 months.

Statutory category of personal information (PI)	PI we collect in this category (See Personal Information We Collect above for description)	Source of PI	Business/commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose
Identifiers	<ul style="list-style-type: none"> • Contact data • Profile data • Identity data 	<ul style="list-style-type: none"> • You • Third party sources 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Third parties related to the Service • Authorities and others • Business transferees
Commercial Information	<ul style="list-style-type: none"> • Profile data • Financial data • Marketing data • Online activity data 	<ul style="list-style-type: none"> • You • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Third parties related to the Service • Authorities and others • Business transferees
Financial Information	<ul style="list-style-type: none"> • Financial data 	<ul style="list-style-type: none"> • You 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Third parties related to the Service • Authorities and others • Business transferees
Online Identifiers	<ul style="list-style-type: none"> • Profile data • Device data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Third parties related to the Service • Authorities and others • Business transferees
Internet or Network Information	<ul style="list-style-type: none"> • Marketing data • Device data • Online activity data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Third parties related to the Service • Authorities and others



Statutory category of personal information (PI)	PI we collect in this category (See Personal Information We Collect above for description)	Source of PI	Business/commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose
				<ul style="list-style-type: none"> • Business transferees
Geolocation Data	<ul style="list-style-type: none"> • Device data 	<ul style="list-style-type: none"> • Automatic collection 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Third parties related to the Service • Authorities and others • Business transferees
Inferences	<p>May be derived from your:</p> <ul style="list-style-type: none"> • Financial data • Marketing data • Device data • Online activity data 	N/A	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Third parties related to the Service • Authorities and others • Business transferees
Professional or Employment Information	<ul style="list-style-type: none"> • Contact data • Identity data 	<ul style="list-style-type: none"> • You • Third party sources 	<ul style="list-style-type: none"> • Service delivery • Research & development • Marketing • Compliance & protection 	<ul style="list-style-type: none"> • Affiliates • Third parties related to the Service • Authorities and others • Business transferees
Protected Classification Characteristics	<p>We do not intentionally collect this information but it may be revealed in identity data or other information we collect</p>	N/A	N/A	N/A