

# Harbor Group Management's Privacy Policy

Effective Date: December 1, 2023

## Introduction

This Privacy Notice (“**Notice**”) is provided to inform you about how Harbor Group International, LLC (“**HGI**”), Harbor Group Management Co., LLC (“**HGMC**”), and our affiliates (collectively referred to as “**we**”, or “**our**”) process the personal information that we collect in online and offline formats through our Services. When we use the term “Services,” we mean to refer collectively to:

- The provision of investment and other services during the operation of our business (“**Investment Services**”);
- The provision of rental and other services during the operation of our business (“**Rental Services**”)
- The websites and mobile applications owned and controlled by us that link to this Notice (“**Sites**”); and
- Our marketing and business development activities, including events we host, social media sites we operate, and emails that we send (“**Marketing Activities**”).

In connection with our Services, we receive personal information from:

- Current, prospective and former investors of HGI funds or other HGI-managed vehicles (“**Investors**”);
- Current, prospective and former renters of HGMC or HGMC-managed properties (“**Renters and Visitors**”); and
- Other business contacts (“**Other Business Contacts**”), including:
  - Visitors to our offices, events, Sites and users of any digital Services we provide;
  - Individual representatives of third-party sellers, placement agents, finders, investment bankers, consultants, lawyers, accountants, advisers and other service providers and vendors, whether or not engaged by HGI, HGMC or our affiliates; and
  - Directors, officers, employees, representatives and other individuals associated with the assets in which HGI has made an investment or is considering making an investment.

This Notice explains the data, including personal information we collect about you, how we collect it, with whom we share it, how we protect your data and privacy, your rights regarding the collected data, and how to contact us regarding this Notice or to exercise your personal information rights. This Notice does not apply to information we collect from our employees, contractors, or applicants for employment. *Important information for current and former investors about how we collect, use, and share your nonpublic personal information, as well as your ability to opt-out of certain sharing can be found in Section 12.*

By using our Sites or providing personal information to us in connection with our Services, you acknowledge that you have read, understood, and agree to the practices described in this Notice.

You agree that any information provided by you to us will be governed by these terms. If you do not agree with the terms of this Notice, you should not use our Sites or Services. This Notice is incorporated into and subject to our [Terms of Use](#).

## **1. Personal Information Sources and Types Collected**

We use the term “personal information” to mean data that reasonably can be used to identify a living person, or that reasonably relates to a living person.

The types of personal information we collect and share depend on your relationship with us. In connection with all of our Services, within the past 12 months, we have collected information from the following groups:

### **Investors:**

We collect the following categories of personal information:

- Contact information (including name, address, email, telephone number);
- Other identification information (including signature, date of birth, social security number, taxpayer identification number, driver’s license, passport, other government identification and numbers);
- Financial information (including assets, income, net worth, amounts and types of investments, capital account balances, capital commitments, capital contributions, account data, other investment participation information, funds transfer information, beneficiaries, positions, percentages of fund, share or option numbers and values, vesting information, investment history, transaction information, tax information);
- Background information (including information revealed in know-your-customer (KYC) and anti-money laundering (AML) due diligence, investor accreditation and consents);
- Sensitive information (as defined by applicable data protection laws) (including specific subset of personal information that includes certain government identifiers (such as social security numbers), age, marital status, or citizenship; and
- Sensory information (including audio recordings of phone calls). We collect this personal information from:

- Forms you complete, such as subscription agreements, investor questionnaires, online contact forms, applications or other forms;
- Your correspondences (written, telephonic, voicemails or electronic);
- Your transactions with us or others;
- Third party service providers (e.g., background screening, investor placement, or public databases) who perform services on our behalf or verify or supplement our information; and
- Information you give to any of our Sites, including registration information and information captured via cookies.

We collect this personal information for the purposes of and pursuant to the legal bases of contract performance, legal compliance, and legitimate interests. These include:

- Complying with legal or regulatory obligations, such as our obligations regarding know your-client and anti-money laundering, as well as for tax purposes;
- Performing a contract with you or to take steps at your request before entering into a contract, including to: (i) provide you with information regarding our services, (ii) assist you and answer your requests, (iii) evaluate whether we can offer you a service and under what conditions;
- Other legitimate business interests, such as:
  - For our everyday business purposes – such as to process your transactions, maintain or service your account(s), communicate with you, pay funds, manage records, respond to court orders and legal investigations, and administer and provide services to you, including onboarding, marketing, research and due diligence;
  - For our marketing purposes – to offer our services to you, provide newsletters or other information that we believe may be of interest to you, to improve and customize our services for you and to understand how our services are used; and
  - For our risk mitigation purposes – to protect against fraud and security risks, including through background screening.
  - In some cases, we rely on your consent for processing your personal information, but only in those cases where we specifically ask for your consent.

### **Renters and Visitors:**

We collect the following categories of personal information:

- Contact information (including postal address and e-mail address, phone number);
- Other identification information (name, birthdate, governmental identification numbers, Social Security number, gender);
- Family information (including number of children, family member names and contact details);
- Tax status information (including tax ID, tax residence);
- Professional and employment information (including employment history, income, resume details, personnel files, pay and benefits information);

- Financial information (including bank account details, credit history and reports);
- Account information (including username and password);
- Service-related information (including requests you make in connection with our Services);
- Other background information (including information on criminal history/unlawful conduct);
- Health information (including dietary restrictions or disabilities);
- Electronic identifying information (including IP address, Site activities, the Internet address you came from or go to, browser information, internet service provider information, date and timestamp information, clickstream information);
- Sensitive information (as defined by applicable data protection laws) (including specific subset of personal information that includes certain government identifiers (such as social security numbers), age, marital status, citizenship, precise geolocation, or information of a known child (with the consent of a parent or guardian, for purposes of tenant applications only); and
- Biometric information (including fingerprints and facial scans).

We collect this personal information from:

#### I. Information you provide to us

In order for you to access certain Services, we may require you to provide us with certain personal information. We may also collect information you provide to us in any communication between us, including phone calls, online form responses, tenant applications, and emails, which we may use to fulfill your requests and to improve our services. On some of our Sites, you can also order services, make requests, register to receive materials and send us communications. For example, you will be furnishing some of your personal information at the time you apply to rent from us, and such information can be from the rental application form or other documents that you provide to us or to an apartment locator service, either on paper or electronically. We collect your personal information when you communicate with us through the Site’s “Contact Us” form. Finally, we collect biometric information when you enroll to receive access controls, key access, and amenity access in our residential buildings.

#### II. Information collected automatically

We use various technologies to collect other types of information that do not directly reveal your identity (“**Other Information**”). If we associate Other Information with your personal information, we will treat the combined information as personal information in accordance with this Notice. For example, in order to measure the usefulness and efficiency of our Sites, we automatically track certain information from all visitors to our Sites. This information is compiled and analyzed on an aggregated basis, and we do not generally track anyone’s individually identifiable information.

### III. Third party sources

We may also collect both public and nonpublic personal information about you, subject to applicable law, from a variety of third party sources. These include commercially-available third parties or our affiliates.

We collect this personal information for the purposes of and pursuant to the legal bases of contract performance, legal compliance and legitimate business interests, including but not limited to the following:

- To operate, evaluate and improve our business, including to:
  - evaluate rental applications and renewals; process and verify statements made on your rental application, such as your rental, credit and employment history;
  - obtain payments from you for any money you may owe us, now or in the future;
  - develop new business opportunities;
  - manage, operate and administer your accounts, including through the use of third party service providers;
  - process and consider applications for employment, including evaluate and confirm suitability for a position and accuracy of any information submitted;
  - monitor and audit compliance with policies and procedures and to meet applicable requirements and orders of regulatory authorities; or conduct Marketing Activities and provide newsletters, updates, invitations and other information of interest.
- To provide you with products and Rental Services;
- To improve and administer our Sites;
- To respond to your requests or inquiries or to otherwise provide user support;
- To prevent, investigate or provide notice of fraud, unlawful/criminal activity or unauthorized access to or use of personal information, Sites or data systems, to conduct risk mitigation activities to maintain and protect the safety and security of our Services, systems, premises and events, or to meet legal obligations, such as tax withholdings; and
- To investigate and resolve disputes and security issues and to enforce our Terms of Use and other agreements.

#### **Other Business Contacts:**

We collect the following categories of personal information:

- Contact information (including postal address and e-mail address, phone number);
- Other identification information (including name, ID card and passport numbers, Social Security number, nationality, place and date of birth, gender, picture);
- Family information (including marital status, number of children, family member names and contact details);
- Tax status information (including tax ID, tax residence);
- Professional and employment information (including resume details, employment history, personnel files, pay and benefits information);

- Financial information (including bank account details, credit card number, wire transfer instructions, assets, income, investor profile, investment experience, credit history and reports, debts and expenses);
- Account information (including username and password);
- Service-related information (including requests you make in connection with our Services);
- Other background information (including information on criminal history/unlawful conduct);
- Health information (including, if you attend our events, dietary restrictions or disabilities, or if a business we are considering investing in makes such information available to us); and
- Electronic identifying information (including IP address, Site activities, the Internet address you came from or go to, browser information, internet service provider information, date and timestamp information, clickstream information); and
- Sensitive information (as defined by applicable data protection laws) (including specific subset of personal information that includes certain government identifiers such as social security numbers, age, or citizenship).

We collect this personal information from:

#### I. Information you provide to us

In order for you to access certain Services and to order materials that we offer, we may require you to provide us with certain personal information. We may also collect information you provide to us in any communication between us, including phone calls, online form responses, and emails, which we may use to fulfill your requests and improve our services. On some of our Sites, you can also order services, make requests, register to receive materials and send us communications. For example, we collect your personal information when you:

- Give us your contact information;
- Seek financial advice;
- Make deposits or withdrawals from your account;
- Tell us about your investment or retirement portfolio;
- Give us your employment history; or
- Communicate with us through the Site’s “Contact Us” form.

#### II. Information collected automatically

We use various technologies to collect other types of information that do not directly reveal your identity (“**Other Information**”). If we associate Other Information with your personal information, we will treat the combined information as personal information in accordance with this Notice. For example, in order to measure the usefulness and efficiency of our Sites, we

automatically track certain information from all visitors to our Sites. This information is compiled and analyzed on an aggregated basis, and we do not generally track anyone's individually identifiable information.

### III. Third party sources

We may also collect both public and nonpublic personal information about you, subject to applicable law, from a variety of third party sources. These include commercially-available third parties or our affiliates. personal information.

We use and collect your personal information for the purposes of and pursuant to the legal bases of contract performance, legal compliance and legitimate business interests, including but not limited to the following:

- To operate, evaluate and improve our business, including to:
  - make, maintain, manage or dispose of our investments;
  - conduct due diligence and evaluate business opportunities;
  - develop new investment opportunities;
  - manage, operate and administer investor accounts, including through the use of third party service providers;
  - obtain payments from you for any money you may owe us, now or in the future;
  - monitor and audit compliance with policies and procedures and to meet applicable requirements and orders of regulatory authorities; or
  - conduct Marketing Activities and provide newsletters, updates, invitations and other information of interest.
- To provide you with products and Investment Services;
- To improve and administer our Sites;
- To respond to your requests or inquiries or to otherwise provide user support;
- To prevent, investigate or provide notice of fraud, unlawful/criminal activity or unauthorized access to or use of personal information, Sites or data systems, to conduct risk mitigation activities to maintain and protect the safety and security of our Services, systems, premises and events, or to meet legal obligations, such as tax withholdings; and
- To investigate and resolve disputes and security issues and to enforce our Terms of Use and other agreements. We may also process personal information to perform a contract with you or to take steps at your request before entering into a contract.
- Finally, we may process personal information with your consent, but only in those cases where we make it clear to you in advance that we are relying on your consent for the processing. You may choose not to provide us with any individually identifiable information; in such an event, you may not be able to use those portions of our Services that require such information.

## 2. Sharing Information with Third Parties

We may share your personal information with our affiliates for business purposes consistent with this Notice, including for Marketing Activities. We may also disclose your personal information to you and your authorized representatives, as well as to the following third parties:

- Legal, governmental and regulatory authorities, including those outside your country of residence;
- Relevant parties performing services on our behalf or for your benefit, including for:
  - information technology services and related infrastructure, such as website hosting and residential portal hosting;
  - customer service, e-mail delivery, catering, document production, delivery services;
  - payment service providers to facilitate rent and other service fee payment transactions;
  - online leasing providers;
  - website analytics providers;
  - SMS text messaging provider;
  - professionals engaged for any investment matter (e.g., accountants, attorneys, counterparties, experts, mediators, opponents, and witnesses);
  - audit, insurance, tax or regulatory services;
  - insurance providers; and
  - other third party service providers contractors we may engage to provide you specific services.
- Relevant parties for Marketing Activities;
- Relevant parties wherever necessary to establish, exercise, defend or enforce your or our legal rights, including responses to legal processes, and to enforce your or our contracts;
- Relevant parties for preventing, investigating, detecting or prosecuting criminal offenses;
- Relevant parties involved in connection with a corporate reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or capital, including for any bankruptcy or similar proceedings; and
- Relevant parties for protecting your or our operations, properties, rights, privacy, health and safety.



### *Third Party Websites*

Our Sites contain links to websites operated by third parties. These other websites may have different information collection and privacy practices than HGI, HGMC or our affiliates, and we are not responsible for their privacy practices or content. We encourage you to review their privacy policies.

### *Selling and Sharing of Personal Information*

We do not sell or share your personal information for purposes of cross-contextual behavioral advertising as defined by California Privacy Rights Act (“CPRA”) and other applicable data protection laws and have not sold or shared your personal information within the 12 months preceding the effective date of this Notice. For the avoidance of doubt, we do not knowingly sell or share the personal information of any individual under 16 years of age.

### **3. Security**

This Notice is adopted to help ensure that your personal information is kept secure. We have implemented security measures to protect your personal information against accidental or unlawful destruction, alteration or other unauthorized disclosure, use or access. Our technical and organizational measures include electronic and procedural safeguards, computer safeguards, adequate physical security barriers, secured files and buildings, and periodic employee privacy training focused on handling personal information. Access to your personal information is restricted to those employees who are trained in the proper handling of client information and have a legitimate business need to access such information. We monitor our security programs to ensure that your personal information is protected.

However, no data transmission or storage system can be guaranteed to be secure at all times. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “How to Contact Us” section below.

### **4. Retention of Your Personal Information**

We take steps to ensure that your personal information is processed for the minimum period required to fulfil the specific purposes for which it was collected. Our criteria for determining the data retention period consider multiple factors, including the amount, nature, scope and business purpose of the data collected. We will retain your personal information during an ongoing relationship with you, for as long as is necessary for the purposes set out in this Notice, unless a longer period is required or permitted under applicable law or is needed to resolve disputes or protect our legal rights. After we no longer need your personal information, we will store or destroy the information in a manner that ensures that no unauthorized person will have access to it. Our

disposal method may include physical destruction or obliteration of paper documents or electronic files containing such information.

## **5. Marketing**

Occasionally, we or certain of our affiliates may process your personal information for Marketing Activities. You may receive marketing via multiple methods because you had chosen to receive them. You may also be required to explicitly opt-in for direct marketing in some situations. Regardless, you will always have an opportunity to manage your preferences by following the “unsubscribe” directions found in the received marketing communication.

Note that some messages are required, including service-related messages like transaction confirmation messages, legal notices, or updates.

## **6. Technology and Cookies**

We use cookies and analytical technologies to provide you with a user-friendly experience. “Cookies” are small data files stored on your hard drive that store certain information accessible to our Sites, like your password or voluntarily-set preferences, which allow us to recognize you, manage your user preferences, deliver targeted communications, customize and enable content on our Sites and analyze your use of our Sites to make them more useful for you. A number of cookies we use will last only for the duration of your web session and expire when you close your browser; other cookies will last longer and are used to recognize your computer when you return to our Sites. You may always decline our cookies, if your browser permits, although in that case, you may not be able to use certain Site features and you may be required to reenter your password more frequently during a web session. Most internet browsers allow you to manage cookie functions and your privacy preferences. For information on how to do this, access the “help” menu on your internet browser or visit [Aboutcookies.org](http://Aboutcookies.org).

In addition to cookies, we may use other tracking technologies, such as web beacons (for example, in the body of our emails) so that we know when you open an email from us or click on a link included in one of these emails. This helps us to understand whether particular content is of interest. Instructions on how to unsubscribe are included in each email.

The following cookies you receive from the Sites are served by us. However, some cookies served by us use code provided by a third party delivering analytical services on our behalf.

*Necessary session management.* These cookies manage your session on the Site, enabling you to navigate different pages of the Site during your session, understand when you have entered information and route content requests correctly.

*Performance and Functionality Cookies:* These cookies are used to enhance the performance and functionality of our Services but are non-essential to their use. However, without these cookies, certain functionality may become unavailable.

Program	Cookie Names	More Information
Vimeo	player, void	To enable videos to play and to collect analytics data such as how long the viewer has watched the video

*Analytics.* Analytics cookies help us collect anonymous statistics on visitors to the Sites, where visitors have come to the Sites from, how long a user spends on the Sites and the pages they visited. This information is used solely for our internal purposes in managing Sites and improving their functionality.

Program	Cookie Names	More Information
Google Analytics	_ga, _gat, _gid, _fbp, 1P_JAR, ANID, APISID, HSID, NID, SAPISID, SID, SIDCC, SSID, Secure-3PAPISID, Secure-3PSID, Secure_APISID, Secure-HSID, Secure-SSID	To track page views across sites

To opt out of the aggregation and analysis of data collected about you on the Sites by Google Analytics, please download and install the Google Analytics Opt-out Browser Add-on.

*Third Party Cookies.* Our third party vendors, such as Real Page, may use cookies to help provide you with our Services.

You can also exercise privacy rights through universal opt-out mechanisms such as the Global Privacy Control (“**GPC**”). The GPC is a browser extension users can download to communicate privacy preferences to the websites they visit. When a user turns on GPC, the browser sends a signal to the websites communicating the preferences.

The opt-outs described above are device-and browser-specific and may not work on all devices. If you choose to opt-out through any of these opt-out tools, this does not mean you will cease to see advertising. Rather, the ads you see will just not be based on your interests. Please note that new services using cookies may be added to the Sites from time to time. We aim to keep the cookies

information as accurate as possible and use all reasonable efforts to regularly review and update the details.

## 7. United States Privacy Rights & Disclosures

Many states have recently passed privacy laws or are in the process of passing privacy laws that may apply to you. Consistent with these laws, such as the California Privacy Rights Act, we give you options to access, edit, or remove certain information, as well as choices about how we contact you. Although some of these rights apply generally, certain rights will only apply to limited individuals or circumstances. To the extent that these laws apply, you may exercise the following rights:

- **Right to Know and Access Information.** Note that much of the information you are entitled to know or access is disclosed in this Notice. You have the right to know about our information practices. You also have the right to access the categories of personal we collect, with whom we share or sell that information, and, in some cases, what specific personal information we associate with you or your account.
- **Right to Data Portability.** If you request a copy of your specific information then we will provide it in an easily accessible format.
- **Right to Deletion or Erasure.** You may request that we delete the personal information we have collected about you. Depending on the applicable law, in some cases we are required or permitted to retain your information, even if you validly requested we delete or erase it.
- **Right to Correct Information.** You may request we correct or rectify inaccurate information we have collected about you.
- **Right to Limit Use of Information for Advertising.** You may opt-out of our use of your personal information for advertising purposes.
- **Right to Withdraw Consent.** You may withdraw your consent to our data privacy practices.
- **Right to Non-Discrimination.** You have the right to not experience discrimination from us for exercising the rights listed in this section. What we mean by discrimination is denying you access to our services or limiting the quality of our services. However, limiting use of, or deleting, your personal information may restrict the purposes or uses that rely on that information. If you need further assistance, you can contact us through one of the channels listed below under “How to Contact Us.”

### *California Shine the Light Law*

Individual Residents of California may request information about our disclosures of certain categories of personal information to third parties (i.e., our affiliates) for such third parties’ direct marketing purpose, consistent with California Civil Code Section 1798.83. Individual California

residents must submit requests to us using the contact information listed in the “How to Contact Us” section.

In response, we will provide a list of the categories of “Personal Information”, as that term is defined by California Civil Code Section 1798.83, disclosed to third parties for direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties.

## **8. European Union, UK and Swiss Privacy Rights & Disclosures**

In addition to the applicable information provided elsewhere in this Notice, the disclosures below apply to any resident in the European Union (“EU”), the United Kingdom (“UK”) and Switzerland.

Certain laws, including but not limited to, the General Data Protection Regulation (“GDPR”) grant you rights to control your personal information. Consistent with these laws, we give you options to access, edit, or remove certain information, as well as choices about how we contact you. Although some of these rights apply generally, certain rights will only apply to limited individuals or circumstances.

To the extent that these laws apply, you may exercise the following rights:

- **Right to Access.** Note that much of the information you are entitled to know or access is disclosed in this Notice. You have the right to know about our information practices. You also have the right to access the categories of data we collect, with whom we share or sell that information, and, in some cases, what specific personal information we associate with you or your account.
- **Right to Rectification.** You may request we correct or rectify inaccurate information we have collected about you.
- **Right to Erasure.** You may request that we delete the personal information we have collected about you. Depending on the applicable law, in some cases we are required or permitted to retain your information, even if you validly requested we delete or erase it.
- **Right to Restrict Processing.** If we process your information based on our legitimate interests as explained in this Notice, you may have the right to restrict processing in certain circumstances.
- **Right to Object.** If we process your information based on our legitimate interests as explained in this Notice, or in the public interest, you can object to this processing in certain circumstances. Where we use your data for direct marketing purposes, you can always object using the unsubscribe link in such communications or changing your account settings.
- **Right to Data Portability.** If you request a copy of your specific information then we will provide it in an easily accessible format.
- **Right to Lodge a Complaint.** You may be entitled to lodge a complaint with your data privacy regulatory authority.

We generally process personal information of those residing in these countries on the legal basis of our legitimate interests in performing the function or service you requested. Where appropriate, we may rely on alternate legal bases, such as your consent to certain types of processing. Where we process your personal information on the basis of consent, we will clearly obtain your opt-in consent.

For purposes of the GDPR, we act as a “data controller” and our headquarters are located in the United States at 999 Waterside Drive, Suite 2300, Norfolk, VA 23510. As a data controller, we are responsible for deciding how we hold and use personal information about you.

The transfer of personal information to our entities outside of these covered countries is governed by data transfer agreements, which are in the form of the standard contractual clauses approved by the European Commission (a copy of which can be obtained from us via the contact details below). Where your personal information is processed by third parties outside of the EU, UK, and Switzerland, we will ensure that appropriate safeguards are in place to adequately protect your personal information, as required by applicable law, including the execution of standard contractual clauses (referred to above) if the recipients are not located in a country with adequate data protection laws (as determined by the European Commission).

## **9. International Privacy Rights & Disclosures**

Other individuals in Andorra, Argentina, Australia, Canada, Cayman, Faroe Islands, Guernsey, Hong Kong, Israel, Isle of Man, Japan, Jersey, Mexico, New Zealand, Singapore, South Korea, Uruguay, and certain other jurisdictions may be entitled to various data subject rights.

Depending on your country of residence, these rights may vary. The rights may include, but are not limited to, the rights listed above, such as the right to opt out of collection and use, the right to access, the right to data portability, the right to withdraw consent, and the right to lodge a complaint with your relevant supervisory authority.

If you are a citizen of one of these countries and wish to know more about your rights and options, please contact us through the “How to Contact Us” section.

## **10. How to Exercise Privacy Rights**

If you wish to exercise your privacy rights please call us toll-free at 1.866.221.3179 or email us at [privacy@harborg.com](mailto:privacy@harborg.com). We will review your requests and respond accordingly. The rights described herein are not absolute and we reserve all of our rights available to us at law in this regard.

Additionally, if we retain your Personal Information only in de-identified form, we will not attempt to re-identify your data in response to a privacy right request. If you make a request related to Personal Information about you, we will need to verify your identity. To do so, we will request that you match specific pieces of information you have provided us previously, as well as, in some instances, provide a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If it is necessary to collect additional information from you, we will use the information only for verification purposes and will delete it as soon as practicable after complying the request. For requests related to particularly sensitive information, we may require additional proof of identification. If you make a privacy rights request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf. We will process your request within the time provided by applicable law.

## **11. Restricted Use**

Our Sites are not intended or designed to be used by children under the age of 13. We do not collect personally identifiable data from any person we know to be under the age of 13 and instruct children under 13 not to send us any personal information. If we become aware that a person submitting information to us is under 13, we delete the information as soon as we discover it and do not use it for any purpose nor disclose it to third parties.

Our Sites are operated from servers in the United States. BY USING OUR SITES AND PROVIDING INFORMATION TO US, YOU CONSENT TO THE TRANSFER AND PROCESSING OF YOUR PERSONAL INFORMATION IN THE UNITED STATES.

## **12. Investor Nonpublic Personal Information**

In addition to the applicable information provided elsewhere in this Notice, the disclosures below apply to any current, prospective, and former investors of Harbor Group International, LLC, HGI Capital Management, LLC, or any of their affiliates. If you access your investor account through our Sites, you leave our Sites and navigate to a third party website that we do not own or control. To establish your investor account, we may have to provide the third-party provider with certain information you submitted to us. By submitting such information to us for the purposes of establishing an investor account, you agree that we are permitted to share such information with our third-party providers for such purpose. We require our third-party providers to only process your information for such specified purpose and to have adequate information security measures in place.

With respect to your personal information as a current, prospective, and former investor, we share such data as follows:

<b>Purposes for sharing information</b>	<b>Does HGI Share?</b>	<b>Can you limit sharing?</b>
<b>For our everyday business purposes</b> - such as to process your transactions, maintain you accounts(s) or respond to court orders and legal investigations	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	No	We don't share
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	Yes	We don't share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	No	We don't share

Federal law gives you some rights to limit the sharing of your information. Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness;
- affiliates from using your information to market to you; and
- sharing for nonaffiliates to market to you.



If you are a new investor, we may begin sharing your information 30 days from the date you are provided this Notice. When you are no longer an investor with us, we may continue to share your information as described in this Notice. However, any current, prospective or former investor can contact us at any time to limit our sharing in accordance with the “How to Contact Us” section below; investor questions and requests relating to their personal information should be directed to [privacy@harborg.com](mailto:privacy@harborg.com). When you limit data sharing for an account you hold jointly with someone else, your choices will apply to everyone on your account unless you tell us otherwise.

### **13. Changes to the Notice & Your Information**

We reserve the right to update this Notice periodically and without prior notice to you to reflect changes in our personal information practices. We encourage you to periodically review this Notice to stay informed about its collection, use and disclosure of your personal information. We will post the updated Notice version on our Sites and indicate at the top of the Notice the date it was most recently updated. Your continued use of our Sites constitutes your agreement to this Notice and any updates.

We also generally seek to ensure that we keep your personal information accurate and up-to-date. However, you are responsible for, and we kindly request that you inform us of, any changes to your personal information (such as a change in your contact details). To update or edit your personal information that we have on file, including your communication preferences, please contact us in accordance with the “How to Contact Us” section below.

### **14. How to Contact Us**

If you have any questions, comments, requests or complaints in connection with the Sites, this Notice and the disclosures contained within this Notice, our use of your personal information, and/or other privacy-related matters, please contact us at:

**Email:** [privacy@harborg.com](mailto:privacy@harborg.com)  
**Call:** 1.866.221.3179  
**Write:** Harbor Group International, LLC  
Attn: Legal & Compliance  
999 Waterside Drive, Suite #2300  
Norfolk, VA 23510

Please be advised that we may ask you to provide further information to verify your identity in responding to your inquiries or requests. Any personal information we receive from you when making privacy-related inquiries will be treated in accordance with this Notice and only used to the extent necessary to process the inquiries and to check on the level of service we provide.