

THIRDACT, PBC
PRIVACY POLICY

Last Updated: February 18, 2018

Thank you for visiting the thirdACT website (the “Website”). This “Privacy Policy” describes the information that thirdACT collects and how thirdACT uses that information.

By using this Website, you (“You,” or “Your”) consent to the terms of our Privacy Policy. We reserve the right to change, modify, add, or remove portions from this Privacy Policy at any time. Each time you use the Website, the then-current version of this Privacy Policy will apply. Amendments to the Privacy Policy will become effective when posted on the Website. We will not provide you with separate notice of any change in our Privacy Policy. Your continued use of our Website following the posting of changes to these terms means you accept these changes. **IF AT ANY TIME YOU FIND THIS PRIVACY POLICY UNACCEPTABLE, YOU MUST IMMEDIATELY LEAVE THE WEBSITE.**

1. Information Collection.

a. Personal Information. thirdACT is committed to appropriately managing any personal information You share with us through the Website. “Personal Information” means any information that can be used to identify an individual, such as a first and last name, personal profile, financial information, a building address, home or work or other physical address, telephone number, email address, demographic information (occupation, age, race, gender), personal preferences, survey data, any responses provided by You, property data, or other contact information. While at this time, we do not require users to register or to provide personal information in order to access the portion of the Website that is open to the public, Your failure to provide certain personally identifying information when asked may prevent certain features of the Website from functioning, or prevent thirdACT from effectively responding to certain of Your requests through the Website. The Website will collect only that personally identifying information that You affirmatively provide in response to a direct request.

b. Information We Get From Others. We may get information about you from other sources. We may add this to information we get from this Website.

c. Information Automatically Collected. We automatically log information about you and your computer. For example, when visiting our Website, we log your computer operating system type, browser type, browser language, the website you visited before browsing to our Site, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Website.

d. Surveys & Contests. From time-to-time our Website requests information via surveys or contests. Participation in these surveys or contests is completely voluntary and You may choose whether or not to participate and therefore disclose this information. Information requested may include contact information (such as name and shipping address), property data (such as valuation, location, address), and demographic information (such as zip code, age level). Survey information will be used for any business purposes, data analytics, or any other purposes thirdACT may deem appropriate.

e. Non-Personal Information; Cookies. Some of thirdACT's Website pages may utilize "cookies" or other tracking technologies. A cookie is a string of information that a website stores on a user's computer, and that the user's browser provides to the website each time the user submits a query to the website. The purpose of any cookie placed on Your computer will be to identify you as a unique user of the Website. Most browsers allow You to control cookies, including whether or not to accept them and how to remove them. thirdACT use analytics tools and other third party technologies, such as Google Analytics, to collect these website usage and user metrics on our online Sites and/or Services. This data is non-personal. These tools and technologies collect and analyze certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage, MAC Address, mobile unique device ID, and other similar information. The third party analytics companies who collect information on our Sites

and/or Services and other online products and/or services may combine the information collected with other information they have independently collected from other websites and/or other online or mobile products and services relating to your activities across their network of websites as well as online and/or mobile products and services. Many of these companies collect and use information under their own privacy policies.

We may allow some third party companies to help us to deliver relevant thirdACT advertising to you based upon an analysis of your use of thirdACT Sites and/or Services. Our use of these technologies to tailor advertising to you is dependent on tracking cookies. You may opt out of Google Analytics tracking by visiting the [Google Analytics opt-out page](#). Google has additional information available about their Remarketing Privacy Guidelines, Policies, and Restrictions.

In some of our email programs, thirdACT uses tracking methods to see who opens and clicks on hyperlinks in emails. We use this information internally to improve our communications and deliver more relevant messages. We don't share this information with any third parties.

f. Children. The Website is not directed to children under thirteen years of age. It is the policy of thirdACT not to knowingly collect, and thirdACT does not intend to collect, personally identifiable information on children under the age of thirteen.

2. Information Use and Disclosure.

a. The Website and thirdACT will use the Personal Information and the personally identifying information You provide to perform the function or functions in connection with which You provide it. We use or may use the Personal Information and the personal identifying information to: (i) operate, maintain, and improve our websites, products, and services; (ii) respond to comments and questions and provide customer service; (iii) send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages; (iv) communicate about

promotions, upcoming events, and other news about products and services offered by us and our selected partners; (v) link, aggregate, or combine user information with other personal information; (vi) protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and/or (vii) provide and deliver products and services customers request.

We may share Personal Information with third parties, such as service providers, when we reasonably believe that disclosure is necessary for the conduct of our business. In such cases, we will have agreements with the third party service providers under which the providers agree to maintain the confidentiality of Your information and to use it only to help us serve You. From time to time, thirdACT may release traffic data, data, and information gathered using cookies in the aggregate. We may share aggregated demographic and other data and related usage information with third parties. This aggregated information will not contain any personal information that can identify an individual user.

b. We may share Your Personal Information with or transfer it to our contractors, vendors, any entity or person we do business with, affiliated companies and our successors and assigns to improve our service to You, to bring to Your attention products and services in which You may be interested, and as is otherwise reasonably necessary for the conduct of our business. From time to time, we may share Your name, contact information, or other personal information with unaffiliated business partners for their use in marketing their products and services to You.

c. We may share Personal Information with others:

- when necessary in order to resolve customer disputes and complaints;
- to protect against fraud;
- to protect the rights and property of thirdACT PBC, our agents, customers, and others. This includes enforcing our agreements, policies, and terms of use;
- to respond to a subpoena;
- in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person;

to report to a credit bureau; and
when otherwise necessary to comply with laws, regulations, and
judicial, regulatory, or administrative orders and directives.

d. We may share any Personal Information, data, financial, underwriting, and processing information about certain contracts with funds, affiliates, and other businesses or persons who have a financial interest or potential financial interest in thirdACT or portfolios of thirdACT.

We may also share aggregated and/or anonymized data with the public or others for their or our own uses.

3. Third Party Websites.

This Website may contain links to third-party websites. We are not responsible for the privacy practices or the content of these websites. Our Website may also use third parties to present or serve advertisements that you may see at our Website. These third party ad servers may use cookies, web beacons, clear gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third party ad servers is subject to their own privacy policies and is not covered by our Privacy Policy. Before providing personally identifying information to any third party website, You should review its privacy policy and practices.

4. Security of Personal Information.

We take precautions and a number of steps to protect Your Personal Information. Here are some examples:

Consistent with industry standards, we have implemented precautions to protect and safeguard the Personal Information under our control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. We authorize our employees, agents, service providers and contractors to get information about You only when

they need it to do their work for us (e.g., in order to process work orders, scope of works, Your application, and originate and service Your property ownership agreement or other contracts with us).

5. Information Choices and Changes

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via the U.S. mail address given below in Section 6.

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Express any concern you have about our use of your data.

Our marketing emails tell you how to “opt-out.” If you opt out, we may still send you non-marketing emails. Non-marketing emails include emails about your accounts and our business dealings with you.

You may send requests about personal information to our Contact Information below. You can request to change contact choices, opt-out of our sharing with others, and update your personal information.

You may be able to remove and reject cookies from our Website with your browser settings. Web browsers might be set to accept cookies until you change your settings. If you remove or reject our cookies, it could affect how our Website works for you.

6. Communications.

If You provide us with an email address or choose to communicate with us by email, then email from us to You will be considered to be sent with Your consent and will be accessible to anyone who has access to Your email.

If you wish to opt out, have any requires, comments or questions regarding this Privacy Policy, please contact us at:

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