



PRIVACY POLICY

Effective as of July 10, 2023

Please click [here](#) to view the previous version of our Privacy Policy.

Please click [here](#) to view our Gramm-Leach-Bliley Financial Notice.

This Privacy Policy describes the privacy practices of Island Capital Group LLC, C-III Capital Partners LLC and their subsidiaries and affiliates (collectively, the “**Company**,” “**we**,” “**us**” or “**our**”) and how we handle personal information that we collect through our digital properties that link to this Privacy Policy, including our websites and our investor portals located at <https://investors.islandcapital.com/> (collectively, the “**Service**”), as well as through our marketing activities, our events, and other activities described in this Privacy Policy.

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

You can download a printable copy of this Privacy Policy [here](#).

California Residents: See the [California privacy notice](#) below for important information about our collection, use and disclosure of your personal information as well as your California privacy rights.

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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 interaction over time with the Service, our communications, and online services, such as:

- **Device Data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (*e.g.*, phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (*e.g.*, WiFi, LTE, 3G), 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, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access, and whether you have opened our marketing emails or clicked links within them.

Cookies and Similar Technologies – Some of the automatic collection described above is facilitated by 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.

- **Local Storage Technologies**, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web Beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for the following purposes and/or as otherwise described at the time of collection:

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, and 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 send you Company-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/or 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 (and their advisors) 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, the Company (including, in connection with a bankruptcy or similar proceedings).

YOUR CHOICES

You have the following choices with respect to your personal information. California residents can find additional information about their rights [below](#).

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 browser settings let you delete and reject cookies placed by websites. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, you may not be able to use all functionality of the Service and it 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 on the Service. You can learn more about Google Analytics cookies at <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage> 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”. 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 we identify as required or mandatory, 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, mobile applications, and other online services operated by third-parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third-party. 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 through the Service 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 use of the Service after the effective date 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:** 888-272-2788

CALIFORNIA PRIVACY NOTICE

Scope. – This section applies only to California residents. It describes how we collect, use and disclose Personal Information of California residents in our capacity as a “business” under the California Consumer Privacy Act (“CCPA”) and their rights with respect to that 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).

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/Know** – 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 the Personal Information.
 - The business or commercial purpose for collecting, sharing, and/or selling Personal Information.
 - The categories of Personal Information that we sold or disclosed for a business purpose.
 - The categories of third-parties with whom Personal Information was sold, shared, or disclosed for a business purpose.
- **Access.** – You can request a copy of the Personal Information that we have collected about you.



- **Deletion.** – You can ask us to delete the Personal Information that we have collected from you.
- **Correction.** You can ask us to correct inaccurate personal information that we have collected about you.
- **Nondiscrimination.** – You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

How to Exercise Your Rights – You may submit requests to exercise your right to information/know, access, deletion, and correction by:

- Visiting www.c3cp.com/ccpa-request-form
- Calling us toll free at 888-272-2788
- Emailing privacy@c3cp.com

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

We will need to verify your identity to process your information/know, access, deletion and correction requests and reserve the right to confirm your California residency. To verify your identity, we may require you to provide government identification, give a declaration as to your identity under penalty of perjury and/or provide additional information. Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with written confirmation that you have given the authorized agent permission to submit the request. Authorized agents are required by California law to implement and maintain reasonable security procedures and practices to protect their clients’ information.

Information Practices – The following describes our practices currently and during the past 12 months:

- **Sources and Purposes** – We collect all categories of Personal Information from the sources described in the section above entitled “[Personal information we collect](#)” and we use such Personal Information for the business/commercial purposes described in the section above entitled “[How we use your personal information](#)”.
- **Sales and Sharing of Personal Information** – We do not “sell” or “share” Personal Information as those terms are defined in the CCPA and have no actual knowledge that we have sold or shared the Personal Information of California residents under 16 years of age.
- **Sensitive Personal Information** – We do not use or disclose sensitive Personal Information for purposes that California residents have a right to limit under the CCPA.
- **Retention** – The criteria for deciding how long to retain Personal Information is generally based on whether such period is sufficient to fulfill the purposes for which we collected it as described in this notice, including complying with our legal obligations.



- **Deidentification** – We do not to attempt to reidentify deidentified information derived from personal information, except that we may do so to test whether our deidentification processes comply with applicable law.
- **Collection and Disclosure** – The chart below summarizes the Personal Information we collect by reference to the categories of Personal Information specified in the CCPA, and describes our practices currently and 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.

Statutory category of Personal Information (“PI”) (Cal. Civ. Code § 1798.140)	PI We Collect in this Category (See “Personal Information We Collect” above for description)	Categories of Third-Parties to whom we Disclose PI for a Business Purpose
Identifiers	<ul style="list-style-type: none"> • <i>Contact data</i> • <i>Profile data</i> • <i>Identity data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Third-parties related to the Service</i> • <i>Authorities and others</i> • <i>Business transferees</i>
California Customer Records (as defined in California Civil Code § 1798.80)	<ul style="list-style-type: none"> • <i>Contact data</i> • <i>Profile data</i> • <i>Identity data</i> • <i>Financial data</i> • <i>Communications</i> • <i>Marketing data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Third-parties related to the Service</i> • <i>Authorities and others</i> • <i>Business transferees</i>
Commercial Information	<ul style="list-style-type: none"> • <i>Profile data</i> • <i>Financial data</i> • <i>Marketing data</i> • <i>Online activity data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Third-parties related to the Service</i> • <i>Authorities and others</i> • <i>Business transferees</i>
Financial Information	<ul style="list-style-type: none"> • <i>Financial data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Third-parties related to the Service</i> • <i>Authorities and others</i> • <i>Business transferees</i>
Online Identifiers	<ul style="list-style-type: none"> • <i>Profile data</i> • <i>Device data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Third-parties related to the Service</i> • <i>Authorities and others</i> • <i>Business transferees</i>
Internet or Network Information	<ul style="list-style-type: none"> • <i>Marketing data</i> • <i>Device data</i> • <i>Online activity data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Third-parties related to the Service</i> • <i>Authorities and others</i> • <i>Business transferees</i>
Geolocation Data	<ul style="list-style-type: none"> • <i>Device data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Third-parties related to the Service</i>



Statutory category of Personal Information (“PI”) (Cal. Civ. Code § 1798.140)	PI We Collect in this Category (See “Personal Information We Collect” above for description)	Categories of Third-Parties to whom we Disclose PI for a Business Purpose
		<ul style="list-style-type: none"> • <i>Authorities and others</i> • <i>Business transferees</i>
Inferences	<p><i>May be derived from your:</i></p> <ul style="list-style-type: none"> • <i>Financial data</i> • <i>Marketing data</i> • <i>Device data</i> • <i>Online activity data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Third-parties related to the Service</i> • <i>Authorities and others</i> • <i>Business transferees</i>
Protected Classification Characteristics	<p><i>We do not intentionally collect this information but it may be revealed in identity data or other information we collect</i></p>	N/A