

Privacy Policy

Welcome to the Privacy Policy (this "Privacy Policy") of ID Plans and its affiliates (collectively, "we," "our," or "us"). This Privacy Policy applies to any of the websites or online services owned, licensed, or operated by ID Plans, including <https://www.idplans.com/> and <https://tenant.idplans.com/> (collectively, our "Websites").

This Privacy Policy sets forth ID Plan's practices regarding our collection, use and disclosure of personal information and other data that you may provide to us, including through our Websites or in e-mail or other electronic communication you send to us. It also describes the privacy rights you may have with respect to your personal information, and your responsibilities and obligations. By providing us with personal information, or by accessing or submitting information through our Websites, you agree to the terms and conditions of this Privacy Policy without limitation or qualification. This Privacy Policy should be read in conjunction with the Terms and Conditions of Use, which is incorporated into, and forms an integral part of, this Privacy Policy.

This Privacy Policy applies to personal information that ID Plans receives during our business operations as a "data controller" - which means we determine the purpose and means of processing such personal information. For purposes of this Privacy Policy, the term "personal information" refers to any information that, either alone or in conjunction with other data, can be used to distinguish or identify a particular individual and is subject to, or otherwise afforded protection under, a law, statute, or regulation governing data privacy or security.

1. What Information Do We Collect?

We collect personal information and other data under a broad range of circumstances. Generally, we collect the following types of personal information and data directly from you:

- **Identity data**, such as your name, title, company/organization name, e-mail address, telephone and fax numbers, physical address (including street, city, state, postal code, and/or country), and date of birth.
- **Registration data**, such as information provided by you when you register for an account to use our Websites, including usernames and passwords.
- **Business contact data**, such as information related to other employees, owners, directors, officers, or contractors of a third-party organization (e.g., business, company, partnership, sole proprietorship, nonprofit, or government agency) with whom we may conduct, or possibly conduct, business activities.

- **Marketing and communications data**, including your marketing preferences and your subscriptions to our publications.
- **Transaction data**, including orders for our products and services and details of payments to and from you, including purchase history and preferences and (limited) payment card information.
- **Leasing and Property Management Services data**, including social security numbers, driver's license numbers and financial information, bank account numbers, and credit/debit card numbers, which is information needed for leasing and underwriting activity, credit and background checks, compliance with loan covenants, insurance claims management, and the sale of shopping centers.
- **Investment data about your investments with us**, including investment amounts and information provided by completing subscription documents for deals closed, your personal investment entities and their co-owners and beneficiaries, and tax related information in connection with your investments with us.
- **Your feedback**, including feedback from you about our Websites as well as our shopping centers and services generally, which may include data gathered from any of our surveys in which you participate.
- **Technical and website usage data** that we automatically collect from individuals who visit or access our Websites, such as a user's Internet Protocol ("IP") address, browser and computer type, access time, the webpage from which you came, and the specific webpage(s) they access.

When you do not provide personal information to us (as requested), we may not be able to provide you the services you need or complete a transaction, and you agree that we will not be liable or otherwise responsible for any actions resulting therefrom.

2. Whose Personal Information Do We Collect

We collect personal information from a range of individuals in the context of our business activities, including from the following: our tenants; stockholders; partners; individuals that use, or otherwise access, our Websites; individuals who visit our centers, premises or facilities; vendors, service providers, contractors and similar types of workers; individuals related to, or otherwise affiliated with, our employees; job applicants; and other individuals who contact us by any means.

3. Children Under the Age of 13

This site is not directed to children and we do not knowingly solicit information from any child under the age of 13. If you are under 13, please do not provide us with any personal information.

4. How Your Personal Information is Used

We may use your personal information to provide you with information or services that you have specifically requested or to fulfill any other purpose for which you provide it. We may also use it to communicate with you about topics in which you may be interested, to provide new information regarding our business, to notify you about changes to our Websites, for any other purpose we describe when you provide personal information or in any other manner with your consent.

5. Do Not Track

We do not currently take steps to respond to browsers' "Do Not Track" signals as no uniform standard to respond to such signals has been developed at this time.

6. Disclosure of Your Information

We do not sell, lease, or rent your personal information to third parties for profit or any other valuable consideration. However, we do share or otherwise disclose your personal information with selected third parties in accordance with applicable law, including under the following circumstances:

- It may be shared within our company, and with our subsidiaries and affiliates.
- It may be collected by a third-party vendor that acts as a hosting service for our Websites or who provides use other business services.
- It may be retained by an outside vendor for storage purposes.
- We may provide your information to a third party if you specifically agree that we may do so.
- We may provide your information to third party service providers, contractors, business partners or other third parties that we use to support our business, including for assistance with sending information by email, mail or other means.
- We may use it to fulfill any purpose for which you provide it.
- We may send one or more "cookies" to you in order to improve the quality of our service, including for tracking user trends and preferences.
- We may need to disclose your personal information when required by law or if we have a good faith belief that such action is necessary to protect our rights or to comply with a court order or subpoena, to cooperate with investigations by law enforcement, regulatory authorities, or governmental entities or to participate or cooperate with a judicial proceeding or arbitration.
- We may disclose your personal information if we believe disclosure is necessary or appropriate to protect the rights, property, safety, or interests of us, our stockholders, our business partners, or others.

- We may disclose Personal Information about our neighbors to credit bureaus, banks and lenders, insurance companies and adjusters, purchasers of shopping centers, and other service providers.
- In a merger, acquisition by another company, a sale of all or a portion of our assets, bankruptcy, liquidation, or other similar transactions, your personal information will, in most instances, be transferred to the control of a third party.
- We may also share your personal information for any other purpose we describe when you provide the information or in any other manner with your consent.

We may remove personal identifiers from the personal information you provide to us and maintain it in a de-identified and aggregate form. We may combine such de-identified information with other information to provide anonymous, aggregated statistical information for use by us, our business partners or our service providers to improve our information, centers, products and services. We may disclose aggregated information about our users without restriction.

7. Cookie Data

Our Websites may use "cookies" or other tracking technology. Cookies are small pieces of program code that reside on your computer. By showing how and when visitors use our Websites, cookies help us identify how many unique users visit us, and track user interests, trends, and patterns, all of which helps us make our Websites more useful. You can opt-out of the use of cookies by having your browser disable cookies or warn you before accepting a cookie. Look for the cookie options in your browser in the options or preferences menu. If you disable cookies in your browser, however, you may not be able to take advantage of certain of the features or functions of, or information, products and service available, via our Websites. Any anonymous data that we collect through the use of cookies or other tracking technology may be used by us and disclosed by us to third parties to improve this Website and to better understand the needs of our users.

8. Data Retention and Localization

The period during which we retain your personal information varies depending on the purpose for the data processing. For example, we retain personal information needed to provide you with products and services, to facilitate transactions you have requested, or to engage in marketing activities, and for so long as necessary to defend our legal or business interests. In all other cases, we retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy. We are based in the United States and the personal information that we collect and process is retained and stored in the United States. Please be aware that the United States may not provide the same level of protection of personal information as in your country, state, or other jurisdiction of residence or nationality, and when transferred to the United States, your personal

information may be accessible by, or otherwise made available to, government authorities and officials pursuant to judicial and/or administrative orders, decrees, and demands, and/or other domestic laws, statutes, and regulations, applicable in the United States. By continuing to provide us such information, you hereby consent to your personal information being transferred to, and stored in, the United States.

9. Information Security

We seek to protect the security of your personal information and use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. HOWEVER, NO INFORMATION SYSTEM CAN BE FULLY SECURE AND WE CANNOT GUARANTEE THE ABSOLUTE SECURITY OF YOUR PERSONAL INFORMATION. MOREOVER, WE ARE NOT RESPONSIBLE FOR THE SECURITY OF PERSONAL INFORMATION YOU TRANSMIT TO OUR WEBSITES AND/OR THE SERVICES OVER NETWORKS THAT WE DO NOT CONTROL, INCLUDING THE INTERNET AND WIRELESS NETWORKS, AND YOU PROVIDE US WITH ANY PERSONAL INFORMATION AND DATA AT YOUR OWN RISK. TO THE EXTENT PERMITTED BY LAW, WE SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENTS THAT MAY COMPROMISE THE CONFIDENTIALITY, INTEGRITY, OR SECURITY OF YOUR PERSONAL INFORMATION. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a username and password to access our Websites, you are responsible for maintaining the security and confidentiality of those credentials and not revealing them to others. You must contact us immediately if you have reason to believe that your username or password to our Websites has been compromised. In the event we are required by law to notify you of a data security incident or compromise, you hereby agree and consent to receive such notification via electronic communication, including email communication.

10. Third Party Privacy Policies

As a resource to you, this site may include links to third party websites. Our Privacy Policy does not apply to such websites, and you should contact them directly for information regarding their privacy policies.

11. Employment Applications and Talent Management

As part of our recruitment and talent management process, we collect personal information with respect to individuals who are interested in working for us. In this context, we collect employment and application data, such as contact information (including, without limitation, name, title, residential or postal address, telephone number, and personal email address); information in a curriculum vitae, resume, cover letter, or similar documentation; details regarding the type of employment sought, willingness to relocate, job compensation and benefit preferences; health data (e.g., medical conditions);

information related to your background, education, criminal record, credit history and similar data; information provided about or by your references or other third parties related to your employment history, skills, qualifications, or education; and, information related to previous applications to us or previous employment history with us. When permitted by law, we may collect information about your race and ethnicity to assist with our diversity and inclusion programs. We use this information for the following purposes: to identify and evaluate job applicants; to verify your information; to complete employment, education, background and reference checks; to communicate with you about the recruitment process and your application; to comply with our legal, judicial, regulatory, administrative, or other corporate requirements; to analyze and improve our application and recruitment process; to accommodate individuals who may have specialized needs during the employment process; and to protect the rights, interests, and property of our business, other job applicants, employees (whom we refer to as our "associates"), or the public, as required, or permitted, by law. We may also use this employment and application data for any other purpose set forth in this Privacy Policy.

12. Your Responsibilities

You are permitted, and hereby agree, to only provide personal information to us if such personal information is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable data protection law, statute, or regulation or infringe upon any individual's data privacy rights or privileges. IF YOU PROVIDE US WITH ANY PERSONAL INFORMATION ABOUT YOURSELF OR A THIRD PARTY, YOU EXPRESSLY REPRESENT AND WARRANT TO US THAT YOU HAVE THE FULL RIGHT AND AUTHORITY TO DISCLOSE SUCH PERSONAL INFORMATION TO US, WE CAN USE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY, AND YOU ARE IN COMPLIANCE WITH THE REQUIREMENTS SET FORTH HEREIN. You also agree to fully reimburse us for any damages, losses, or expenses that arise based on your violation of your representations, warranties and responsibilities set forth in this Privacy Policy.

13. Email Marketing and Opt-Out Requests

You have the right to opt-out of receiving electronic direct marketing communications from us. All electronic direct marketing communications that you may receive from us, such as e-mail messages, will give you an "unsubscribe" option of not receiving such communications from us in the future. California residents have the right to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share personal information with third parties whom we have reason to believe use such information for their own direct marketing purposes.

14. Nevada Privacy Rights

Although we do not currently conduct sales of personal information, Nevada residents may submit a request directing us to not sell their personal information that we maintain about them to third parties who will sell or license their information to others.

15. Persons with Disabilities

We strive to ensure that every person has access to information related to our products and services, including this Privacy Policy. Please contact us if you would like this Privacy Policy provided in an alternative format and we will seek to meet your needs.

16. Events and Video Teleconferencing

We host and use video teleconferencing platforms to facilitate conferences, meetings, training events, and other programs. We often use online platforms that are owned and administered by a third-party service provider (e.g., Zoom, Cisco, or Microsoft). Please be aware that our video teleconferencing may record the content, sessions, conversations, and discussions thereon, and such records may be stored or retained by us or our third-party service providers. By participating in these events and video teleconferencing, you hereby consent to the collection and retention of any information provided therein, and hereby consent to the recording of such activities.

17. Your California Privacy Rights

In this California Rights Privacy Statement (this "Statement"), we want you to be aware of how we collect, use and share your personal information. This Statement covers information we collect online through our Websites, and from third parties and information we collect offline, for example from our neighbors, associates, vendors and investors. If you are a California resident, California law permits you to request Information regarding the:

- Categories of personal information collected, received, sold or disclosed by us;
- Purposes for which categories of personal information collected by us are used;
- Sources of information from which we collect personal information; and
- Specific pieces of personal information we have collected about you.

In addition, if you are a California resident you may:

- Opt-out of receiving marketing communications from us; however, you may still receive administrative communications regarding our services;
- Request deletion of your personal information by us and our service providers, in some circumstances. Please be aware that in many instances, the law allows us to retain your personal information for several lawful purposes.

You will not be discriminated against for exercising your rights under the California Consumer Privacy Act ("CCPA"). You may exercise these rights via one of the methods described below under the section titled "How to Make Requests".

Collection of Personal Information from California Residents

We have listed below the personal information we may have collected from California residents in the past 12 months.

Category of personal information we may collect: Identifiers (including, but not limited to, names, addresses, email address, IP addresses, cookie identifiers)	
Categories of sources from which we may obtain your Identifiers include, but are not limited to:	Directly from individuals; public records from government entities; business to business companies; real estate data compiling companies; third-party verification companies; indirectly from individuals (e.g., use of our Websites); law enforcement; insurance companies; sellers of shopping centers; brokers; consultants and attorneys; title companies; environmental firms
The purposes for collecting your Identifiers include, but are not limited to:	Communications; marketing and advertising services; managing our relationship and your account; verifying customer information; qualifying individuals; fulfilling transactions and payments; acquisition due diligence; collections; system administration and security; shopping center management operations; purchasing analysis; project management administration; talent management and job applicant processing
Category of personal information we may collect: Commercial Information (including, but not limited to, records of personal property)	
Categories of sources from which we may obtain your Commercial Information include, but are not limited to:	Directly from individuals (neighbors); business to business companies; service providers; commercial agreements
The purposes for collecting your Commercial Information include, but are not limited to:	Managing and servicing accounts; collections; system administration
Category of personal information we may collect: Internet/Electronic Activity (including, but not limited to, browsing history, search history, or information regarding interaction with our Websites)	
Categories of sources from which we may obtain your "Internet/Electronic Activity" include, but are not limited to:	Directly from individuals that of our Websites; tenant platform (e.g., IDTenant) activity log
The purposes for collecting your "Internet/Electronic Activity" include, but are not limited to:	Internal marketing analytics; troubleshooting; analytics; system administration/security; billing; collections; talent management and job applicant processing
Category of personal information we may collect: Personal Characteristics (including, but not limited to, for example, race, religion, gender identity, gender expression, marital status, military or veteran status, disability, etc.)	

Categories of sources from which we may obtain your Personal Characteristics include, but are not limited to:	Directly from individuals; photos/videos; leases; service contracts
The purposes for collecting your Personal Characteristics include, but are not limited to:	Internal marketing analytics; troubleshooting; analytics; system administration/security; billing; collections; claims management; shopping center management; purchasing analysis, due diligence; managing and servicing accounts; operations; talent management and job applicant processing.
Category of personal information we may collect: Protected Identifiers (including, but not limited to, telephone numbers, signatures, insurance policy numbers, and financial information)	
Categories of sources from which we may obtain your Protected Identifiers include, but are not limited to:	Directly from individuals; business to business companies; vendors/consultants/attorneys; surveyors; title companies, environmental firms; government and public records
The purposes for collecting your Protected Identifiers include, but are not limited to:	Managing and servicing accounts, verifying customer information, fulfilling transactions; purchasing analysis; shopping center management; operations; communications; system administration; security
Category of personal information we may collect: Video and Telephonic Recording Information (including, but not limited to, voice and video recordings and facial recognition)	
Categories of sources from which we may obtain your Biometric Information include, but are not limited to:	Directly from individuals (voicemail; help desk); cameras at shopping centers
The purposes for collecting your Biometric Information include, but are not limited to:	Communications; troubleshooting; shopping center management; security
Category of personal information we may collect: Professional or Employment Related Information (including, but not limited to, employer, dates of employment and job title)	
Categories of sources from which we may obtain your Professional or Employment Related Information include, but are not limited to:	Directly from individuals
The purposes for collecting your Professional or Employment Related Information include, but are not limited to:	Purchasing analysis; due diligence; operations; qualifying individuals; shopping center management; system administration; billing; collections; account administration; payments; talent management and job applicant processing
Category of personal information we may collect: Education Information (including, but not limited to, schools attended and degrees obtained)	
Categories of sources from which we may obtain your Education Information include, but are not limited to:	Directly from individuals, third party references, previous employers, background check providers.
The purposes for collecting your Education Information include, but are not limited to:	Purchasing analysis; due diligence; operations; shopping center management; qualifying individuals; shopping system administration; billing; collections; account administration; payments; talent management and job applicant processing

Below is information on whether we sell or share your personal information.

Selling your personal information	
Categories of third parties we may sell your personal information to:	We do not sell personal information to third parties for profit or other valuable consideration.
Categories of third parties to whom information was disclosed for a business purpose:	Prospective purchasers; purchasers; brokers; vendors; consultants; lenders; joint venture partners; web developer; potential debt or equity sources; social networks, service providers; local municipalities; courts; insurance companies; adjusters; lease assignees; collection firms; audit firms; banks
Business Purposes for sharing information with service providers or third parties:	Marketing and advertising services; mail services; account management; communications; underwriting; identity verification; detecting security incidents; protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity; customer service; billing; collections; payments; lease administration; audit; legal compliance; valuations; system administration and security; loan compliance requirements; troubleshooting; product development and improvements; talent management and job applicant processing

How to Make Requests

You can make Access or Deletion requests by the following method:

1. Email by emailing support@idplans.com

Please be aware that we do not accept or process requests through other means (e.g., via fax, social media, etc.).

If you make, or an authorized agent on your behalf makes, any request related to your personal information under California law, we will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required under the law before addressing your request. We may require you to match at least two or three pieces of personal information we have previously collected from you before granting you access to or deleting your personal information. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein. Please also be aware that making any such request for the deletion of your personal information does not ensure complete deletion of the personal information and there may be circumstances in which the law does not require or allow us to fulfill your request.

18. How to Contact Us About this Privacy Policy

If you have any questions regarding this Privacy Policy, please email us at: support@idplans.com.

19. Modifications to Privacy Policy

At any time, we reserve the right to add to, modify or remove portions of our Privacy Policy. The effective date of our Privacy Policy will be included at the beginning of the Privacy Policy and will serve as a notice of when changes have been implemented to the Privacy Policy. Please check back to this page from time to time to determine if any revisions have been made. Your continued use of this Website after any revisions have been made will indicate your acknowledgement of such changes and agreement to be bound by the updated terms and conditions.

Use of this Website constitutes your acceptance of our Privacy Policy.