

GATSBY INVESTMENT PRIVACY POLICY

Last updated: January 17, 2022

Gatsby Investment LLC, its subsidiaries and affiliates ("Gatsby Investment," "Gatsby," or "we," "us," or "our") respects your privacy. This Privacy Policy ("Policy") is intended to describe how Gatsby collects, uses, and shares information that you submit to us, that we may collect automatically through our website, and that is provided by and to our business partners. This Policy applies to our Services and to where it is specifically and explicitly adopted. When we write "Services", we mean the provision and operation of our real estate investment business, including determining who may invest with us, processing and transferring investment and investment-related funds, providing customer service, verifying customer information, in addition to the operation of our website, <https://www.gatsbyinvestment.com/> (the "Website").

Please note that certain requirements and disclosures in this Policy may be subject to exemption or otherwise may not apply to you based, for example, on applicable law or regulations.

1. Information We Collect

As described in this Policy, we may collect Personal Information from or about you in order to provide, enhance, market, and offer our Services to you. "Personal Information," for purposes of this Policy, generally includes information that we collect to provide the Services that may be used to identify you specifically.

You may not be required to provide all of the Personal Information identified in this Policy to receive the Services; however, please be advised that if you do not provide Personal Information requested by us, we may be unable to provide some or all of the Services to you.

This section describes the categories of Personal Information we may collect, including Personal Information that we have collected in the past twelve months.

Categories of Personal Information We Collect	Examples of Personal Information We Collect
Identifiers	Name, home and work address, home and work phone number, mobile phone number, social security number, driver's license number, passport number, tax identification number, other government-issued identification numbers, alien registration number, date of birth, email address, username and password, IP address, electronic device ("Device") identifier, Device type, browser type, platform type, cookies, pixels, beacons
Financial information	Financial account number, account balance, account history, income, debt, assets, credit history, credit score, investment experience, risk tolerance, and information about your personal investment goals or objectives
Protected classifications under California or federal law ("Protected Class Information")	Age, sex, gender, national origin, citizenship, race, ethnicity, marital status, and disability status
Commercial information	Records of personal property

Internet or similar network activity	Browsing history, search history, clickstream data, session information, navigation paths, and other information about how you interact with our Website
Geolocation data	Physical location or movements
Sensory data	Audio recordings and photographs

In addition, we may compile aggregate, anonymous, or de-identified data from various sources, including, but not limited to, accounts and transactions. This data, which we may use for our business purposes consistent with applicable law, does not identify an individual and is not Personal Information.

2. Sources of Information and Purposes of Collection and Disclosure

This section describes the sources we collect Personal Information from and why we collect and, if applicable, share Personal Information.

Sources of Personal Information	Categories of Personal Information We Collect	Purposes of Collecting and Sharing Personal Information
<p>Applications and Forms</p> <p>We may collect Personal Information from you or your authorized representatives during the application or account creation process, through other forms, or through discussions we have with you or your authorized representatives. In connection with this process, we may also collect Personal Information from our affiliates, consumer reporting agencies, government agencies, and other third parties</p>	<ul style="list-style-type: none"> Identifiers Financial information Protected Class Information Professional or employment-related information 	<ul style="list-style-type: none"> Provide Services Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity Comply with legal and regulatory obligations
<p>Communications and Interactions with Us</p> <p>We may collect Personal Information from you or your authorized representative when you communicate with us, including when you contact customer support, submit inquiries, request information from us, or participate in a promotion, contest or survey.</p>	<ul style="list-style-type: none"> Identifiers Financial information Protected Class Information Sensory data 	<ul style="list-style-type: none"> Provide Services Enhance the Services Market, advertise, and promote the Services Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity Comply with legal and regulatory obligations

<p>Investment Activity</p> <p>We may collect Personal Information from you and from records we create about you when you make investments with us.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information 	<ul style="list-style-type: none"> • Provide Services • Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity • Comply with legal and regulatory obligations
<p>Our Website</p> <p>We may collect Personal Information from your Device when you visit or interact with our websites. We may also collect Personal Information about your Device from service providers that market data analytics</p>	<ul style="list-style-type: none"> • Identifiers • Internet or similar network activity • Geolocation 	<ul style="list-style-type: none"> • Enhance the Services • Market, advertise, and promote the Services • Protect against unauthorized access, security incidents, fraud, and other malicious or illegal activity • Comply with legal and regulatory obligations
<p>Social Media and Online Forums</p> <p>We may collect Personal Information from third-party social media platforms and sites, when you engage with our social media pages, online communities and forums, and when you mention us on your own or other social media pages, online communities or forums. Please note that online forums may be publicly accessible and other users may view information you post in the forums. We encourage you to exercise care in deciding what information and content you wish to disclose on the areas of the Site that are accessible to the general public.</p>	<ul style="list-style-type: none"> • Identifiers 	<ul style="list-style-type: none"> • Provide Services • Enhance the Services • Market, advertise, and promote the Services • Comply with legal and regulatory obligations

3. Information We May Share and Who We May Share It With

This section describes the categories of Personal Information we may share, including Personal Information we have shared in the past twelve months, and the parties we may share it with. We may share your Personal Information for the purposes described in Section 2, when you have provided your consent for disclosure, or as otherwise permitted or required by law.

Categories of Third Parties with Whom We Share Personal Information	Categories of Personal Information We Share
<p>Operational Service Providers</p> <p>We may share your Personal Information with service providers that help us perform the Services, including, for example, companies that provide administrative, telecommunications, system, software, funds transfer, and real estate development services, and that prepare and send account statements and transaction confirmations and other services in connection with the operation of our business.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information • Protected Class Information • Sensory data
<p>Security Service Providers</p> <p>We may share Personal Information to service providers that detect, protect against, and respond to security incidents or other malicious, deceptive, illegal or fraudulent activity or actual or potential threats to the safety or well-being of any person.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information • Internet or similar network activity • Geolocation data • Sensory data
<p>Marketing and Advertising Firms</p> <p>We may share Personal Information to service providers that perform marketing, advertising or market research on our behalf.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information • Internet or similar network activity • Geolocation data
<p>Data Analytics Firms</p> <p>We may share Personal Information to service providers that perform data analytics to help us improve our Services and develop new offerings.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information • Protected Class Information • Internet or similar network activity • Geolocation data
<p>Government Entities</p> <p>We may share Personal Information with government agencies, regulators, self-regulatory bodies, and law enforcement officials. In certain cases, laws and regulations may require us to share Personal Information with these entities.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information • Protected Class Information • Internet or similar network activity • Geolocation data
<p>Professional Service Firms</p> <p>We may share Personal Information with professional service firms that help us comply with our legal and regulatory obligations and establish, enforce, and otherwise exercise our rights and defend against claims, including, for example, auditors, law firms, and consultants.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information • Protected Class Information • Internet or similar network activity • Geolocation data
<p>Affiliates</p> <p>We may share your Personal Information with our affiliates.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information • Protected Class Information • Commercial information • Internet or similar network activity • Geolocation data • Sensory Data

<p>Merger and Acquisition Activity</p> <p>We may share your Personal Information with third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment, or other disposal of all or part of our business or assets (including accounts) for the purposes of evaluating and performing the proposed transaction.</p>	<ul style="list-style-type: none"> • Identifiers • Financial information • Protected Class Information • Commercial information • Internet or similar network activity • Geolocation data • Sensory Data
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4. Use of Cookies and Similar Technologies and Interest-Based Advertising

4.1 Cookies and Similar Technologies

We and our third-party service providers may use cookies and similar technologies on our Website to improve user experience, for performance and analytics, and to improve our content, products, and services. Certain information may be stored or accessed using tracking technologies such as "cookies" and "web beacons" that may be downloaded to your Device when you visit or interact with our Website. This information may include, but is not limited to:

- IP address, UDID or other unique device identifier, a number that is automatically assigned to your Device and used by us to identify your Device;
- Device functionality and characteristics (including browser, operating system, hardware, and mobile network information);
- The URL that referred you to our website;
- The areas within our Website that you visit and your activities, including remembering your preferences; and
- Device location.

A "cookie" is a small text file that a web server stores in browser software. A browser sends cookies to a server when the browser makes a connection to the server (for example, when requesting a web page from the same domain that created the cookie). The purpose of cookies is to remember the browser over time and distinguish one browser instance (or user) from all others. Some cookies and other technologies may serve to track personal information previously entered by a web user on the Website. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. Cookies can remember login information, preferences, and similar information.

Cookies, as well as other tracking technologies, such as HTML5 local storage, and Local Shared Objects (such as "Flash" cookies), and similar mechanisms, may record information such as a unique identifier, information you enter in a form, IP address, and other categories of data.

If you want to block the use and saving of cookies from the Website on to the computer's hard drive, you should take the necessary steps within your web browser's settings to block all cookies from the Services and external serving vendors, or use the cookie control system. Please note that if you choose to erase or block your cookies, certain parts of our Services may not function correctly. For information on how to disable cookies, refer to your browser's documentation.

4.2 Do Not Track

Do-Not-Track is a public-private initiative that has developed a "flag" or signal that an Internet user may activate in the user's browser software to notify websites that the user does not wish to be "tracked" by third-parties as defined by the initiative. Our websites do not alter their behavior when we receive a "Do

Not Track" signal from browser software. Currently, we do not monitor or take any action with respect to these signals or other similar mechanisms.

5. Your Preferences

In certain cases, you may be able to limit the types of communications you receive and certain sharing of your Personal Information.

5.1 Updating Your Information

As a customer, you may access and update some of your Personal Information on relevant pages on the website. If you believe that your Personal Information is inaccurate, incomplete, or out-of-date, you also may contact us using the information in the "Contact Us" section of this Policy.

5.2 Limiting Direct Marketing

If you would like to stop receiving newsletters or other marketing or promotional messages, notifications, or updates from us, you may follow the unsubscribe instructions that appear in these e-mail communications or you may opt out by contacting us through the information in the "Contact Us" section of this Policy. You may not be able to opt out of receiving certain service or transactional messages from us, including, for example, legal notices.

6. Notice to California Residents

YOUR PRIVACY RIGHTS

Under Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information (as defined by California law) the business shares with third parties for those third parties' direct marketing purposes, and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one request each year by emailing us at info@gatsbyinvestment.com with "Request for California Privacy Information" in the subject line and in the body of your message. Please be sure to provide in the request sufficient information to properly identify you and/or the members of your family.

Disclosures and Sales of Personal Information for Business or Commercial Purposes

We may disclose and sell the following types of Personal Information to third parties for a business or commercial purpose, as further described in the chart above:

- Identifiers
- Financial Information
- Protected Class Information
- Commercial information
- Internet or similar network activity
- Geolocation data
- Sensory data

Rights of California Residents

If you are a California resident, subject to applicable law, you have the following rights under California law with respect to your Personal Information:

Right to Know. You have the right to request what Personal Information we collect, use, disclose, and/or sell, as applicable.

Right to Delete. You have the right to request the deletion of your Personal Information that is collected or maintained by us.

Right to Non-Discrimination. You have the right not to receive discriminatory treatment by us for the exercise of the privacy rights described above.

We do not sell your Personal Information, including the Personal Information of consumers we actually know are less than 16 years of age.

You may also authorize someone to exercise the above rights on your behalf, provided that you provide that person with written signed permission to do so, verify the authorized person's identity with us, and directly confirm with us that the authorized person provided the written signed permission to submit your request. If we have collected information on your minor child, you may exercise the above rights on behalf of your minor child.

The above rights are subject to our being able to reasonably verify your identity and authority to make these requests. These rights are also subject to various exclusions and exceptions under applicable laws. We may ask you to verify your identity by answering certain questions. We will not disclose or delete any information until your identity is verified.

For more information or if you have questions or concerns about our privacy practices or would like to exercise the above described rights as applicable, please contact us by email or by mail or phone using the details provided below:

Gatsby Investment LLC
269 S. Beverly Drive, Suite 408
Beverly Hills, CA 90212
info@gatsbyinvestment.com
866-428-7291

7. Notice to Nevada Residents

We are providing you with this notice pursuant to Nevada state law. Nevada state privacy laws permit us to make marketing calls to existing customers, but if you prefer not to receive marketing calls, you may be placed on our internal "do-not-call" list by calling us at 866-428-7291. For further information, contact the Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Ave., Suite 3900, Las Vegas, NV 89101; by phone at 702-486-3132; or by email at BCPINFO@ag.state.nv.us.

8. Updates to this Policy

We may update this Policy from time to time. We encourage you to periodically review this Policy to learn about updates to our privacy practices.

9. Contact Us

For more information about our privacy practices, or if you have questions or concerns, please visit the [Contact Us](#) page on our website, call 866-428-7291, or email us at info@gatsbyinvestment.com. You may also contact us by mail at the following address:

Gatsby Investment LLC
269 S. Beverly Drive, Suite 408
Beverly Hills, CA 90212