

## CCPA Privacy Notice

**Last Updated: January 1, 2020**

This California Consumer Privacy Act (“CCPA”) privacy notice (this “CCPA Notice”) is included in our Privacy Policy and applies to MREC Management, LLC (“MREC,” “we” or “our”) processing of “personal information,” as defined in the CCPA, of California residents (collectively, “Consumers,” “you” or “your”). Any capitalized terms or other terms not defined herein shall have the meaning ascribed to them in the Privacy Policy or, if not defined herein or in the Privacy Policy, the CCPA. To the extent of any conflict between this CCPA Notice and the rest of our Privacy Policy, this CCPA Notice shall control only with respect to Consumers and their personal information.

### General

This CCPA Notice provides further detail regarding (a) how we have processed Consumers’ personal information within the past twelve (12) months and (b) your rights under the CCPA.

### Personal Information We May Collect

We may collect and disclose the following personal information for our business purposes.

<b>Categories of Personal Information</b>	<b>Examples</b>	<b>Source of Personal Information</b>
Identifiers	<ul style="list-style-type: none"><li>• Name</li><li>• Alias</li><li>• Online identifier</li><li>• Internet Protocol address</li><li>• E-mail address</li><li>• Unique personal identifier (i.e. – persistent identifier such as device identifier, cookies, beacons, pixel tags, mobile ad identifiers or similar technology; customer number, unique pseudonym or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers)</li></ul>	<ul style="list-style-type: none"><li>• Websites, Cookies, Verbal or Written Correspondence, or Agreements to Engage MREC for any Services (information collected directly from user)</li></ul>
Internet or Network Activity	<ul style="list-style-type: none"><li>• Interaction with an internet website, application, or advertisement</li></ul>	<ul style="list-style-type: none"><li>• Websites, Cookies, Verbal or Written Correspondence, or Agreements to Engage MREC for any Services (information collected directly from user)</li></ul>

For each of the above categories of personal information, we use your personal information to carry out the following business purposes and any other purpose identified by us at the time the information is collected:

1. *Providing Services and Improving our Website*: We use information about you to provide you services and improve our websites and the information we provide. We might use your personal information to provide new or updated online content to you and/or to customize your experience with us. For example, we may use your personal information to improve our services, our website, our recruiting efforts and our other internal business purposes.
2. *Security and Fraud Prevention and Detection*: We use information for security purposes such as fraud prevention and detection. We may use personal information to enforce our rights, for fraud prevention, or to protect our company, affiliates, our customers, or our websites, or a third-party website or platform.
3. *Compliance with Laws and to Protect Ourselves*: We use your personal information to support auditing, legal and compliance purposes including responding to court orders or subpoenas. We may also share your personal information if a government agency or investigatory body requests. We may also use your personal information when we are investigating potential fraud or other areas of concern or if we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others.
4. *Recruiting and Marketing*: We use personal information to inform you about MREC. For example, we might send you information about MREC and what we offer. We might tell you about new features or updates. We may also use your personal information to send you information about career opportunities.
5. *Communications*: We use personal information to communicate with you about your account or our relationship. We may contact you about your account or feedback. We might also contact you about our Privacy Policy or our website's Terms of Use.
6. *Debug and Identify Errors*: We use your personal information to debug and identify and repair errors that impair existing intended functionality.
7. *Statistical Analysis and Research*: We may use your personal information for statistical analysis and research purposes including analyzing performance.

## **Your CCPA Rights**

### Access

You may request that MREC disclose certain information regarding our use of your personal information over the past twelve (12) months. You may only make such requests twice per twelve (12) months.

Upon verifying your request (see below), we will disclose to you:

1. The categories of personal information we collected about you.
2. The categories of sources for the personal information we collected about you.
3. The specific pieces of personal information we collected about you.
4. Our business purpose for collecting that personal information.
5. The categories of third parties with whom we share personal information.

### Deletion

You have the right to request that MREC delete any of the personal information collected from you and retained by us, subject to certain exceptions. Once your request is verified (see below) and we have determined that we are required to delete that information in accordance with applicable law, we will delete, and direct our service providers to delete, your personal information from our records. Your request to delete your personal information may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the CCPA. Please note that a record of your deletion request may be kept pursuant to our legal obligations.

### **Exercising Your Rights**

To exercise any of the rights described above, please submit a request to us by either:

- Calling us at +1.833.305.6208.
- Email us at [compliance@mosaicrei.com](mailto:compliance@mosaicrei.com)
- Visiting our website and submitting a request at <https://mosaicrei.com/>

Please note that Consumers have a right to not receive discriminatory treatment for the exercise of their rights under the CCPA.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access twice within a 12-month period. Your verifiable consumer request must:

1. Provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information, or a person authorized to act on your behalf; and
2. Describe your request with sufficient detail to properly understand and respond to it.

We will only use the personal information that you have provided in a verifiable consumer request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority.

Making a verifiable consumer request does not require you to create an account with us. We consider a request made through your password-protected account sufficiently verified when the request relates to personal information associated with that specific account.

### **Verifying Your Request**

Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child. *In all cases, your request must be verified before we take action* (and shall take such action pursuant to the timing permitted under the CCPA). Verifying your request may require you to:

1. Provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information, or a person authorized to act on your behalf; and
2. Describe your request with sufficient detail to properly understand and respond to it.

We will only use the personal information that you have provided in a verifiable request in order to verify your request. As stated above, we cannot respond to your request or provide you with personal information if we cannot verify your identity or authority.

Making a verifiable request does not require you to create an account with us. We consider a request made through your password-protected account sufficiently “verified” when the request relates to personal information associated with that specific account and you have complied with any of our existing authentication practices.

### **Response Timing and Format**

We aim to respond to customer requests within forty-five (45) days of receipt. If we are unable to deliver a response to verifiable consumer requests within this timeframe, we will inform you of the reason and estimated extension period in writing.<sup>1</sup> We will deliver a response to your existing account with us, if applicable, or a written response by mail or electronically, at your option.

Any disclosures will cover only the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. Data portability requests will be issued in a format that is readily useable, we do not charge a fee unless your request is excessive, repetitive, or manifestly unfounded.<sup>2</sup> If the request warrants a reasonable fee, we will tell you why and provide you with a cost estimate before completing your request.

### **Fees**

Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, or manifestly unfounded.

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<sup>1</sup> The response period may be extended up to forty-five (45) additional days where necessary, taking into account the complexity of your request.

## **Changes to this Privacy Statement**

If, in the future, we intend to process your personal information for a purpose other than that which it was collected, we will provide you with information on that purpose and any other relevant information at a reasonable time prior to such processing. After such time, the relevant information relating to such processing activity will be revised or added appropriately (either within this Privacy Policy or elsewhere), and the “Effective Date” at the top of this page will be updated accordingly.

## **Further information**

If you have any queries, questions, concerns or require any further information in relation to the Privacy Statement or you wish to exercise any of your rights, please do not hesitate to contact MREC at [compliance@mosaicrei.com](mailto:compliance@mosaicrei.com).

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