

Horizon Realty Management – Privacy Policy

This Privacy Policy describes how Horizon Realty Management, Inc. (doing business as “Horizon Realty Management”, “Horizon”, and “HRM”, together with its subsidiaries and affiliates “Horizon”, “us”, “we” or “our”) gathers and uses personal information about you when you communicate with us, when you visit Horizon Realty Management’s websites that link to this Privacy Policy (including www.horizonfl.com and any sites that are automatically redirected to us, collectively, the “Sites”); how we protect and share this information; and the rights you may have in relation to this information. Please read this Privacy Policy carefully, and consult our Terms of Use for more information about the general terms and conditions regarding your use of the Sites.

In the event that you have any questions or concerns about this Privacy Policy, or if you object to our uses of your personal information, please contact admin@horizonfl.com.

A. The Types of Information We Collect

When you visit and browse the Sites, you may provide us with information, and we will collect certain information automatically.

1. Information You Provide to Us

In order to access certain services provided via the Sites or to request certain information from Horizon Realty Management via the Sites, you will be required to provide certain personal information.

This may include your name, postal address, e-mail address, telephone number, facsimile number, investor status, or other information about yourself. In particular, you may be required to provide a username and password to access certain features. If you choose to not provide us with information, you might not be able to gain access to certain information and services on the Sites, which rely on such information (for example, if you choose not to provide a username and password, we will not be able to provide you with services available through an online account).

2. Information We Collect Automatically

We also collect information about you automatically.

For example, when you visit the Sites, we collect your IP address, your browser type, your operating system, the pages you view on the Sites, the duration of your visit, the pages you view immediately before and after you access the Sites, and the search terms you enter on the Sites.

We collect this information using cookies, which are small files that a website sends to your computer or device while you are viewing the website, or other technical methods to track visitor usage, including web beacons, which are small pieces of data that are embedded in images on the pages of a website.

We and other companies use cookies and web beacons for a variety of purposes. For instance, when you return to our Sites after logging in, cookies provide information to the Sites so that the Sites will remember who you are. We use web beacons and other technologies to analyze the traffic patterns on the Sites, such as the frequency with which our users visit various parts of the

Sites.

You may be able to have your browser warn you when a cookie is sent, and you may be able to turn off all cookies. You can do this through your web browser settings. Each browser is different, so look at your browser Help or Settings menu to learn the correct way to modify your cookie settings. If you turn cookies off, you won't have access to many features that may improve your browsing, like the features mentioned above, and some of our services may not function properly.

Other technical methods including web beacons may involve the transmission of information either directly to us or to another party authorized by us to collect information on our behalf. We may also use these technical methods in HTML e-mails that we send visitors to the Sites to determine whether such visitors have opened those e-mails and/or clicked on links in those e-mails.

If you communicate with our employees and other staff members via e-mail, telephone, or other electronic channels, our information technology systems record details of those communications, sometimes including their content, for compliance and record-keeping purposes.

3. Additional Information Collection Practices

The Sites may contain links to websites operated by third-parties, and your personal information may be collected by those third-parties when you use their websites.

Should you choose to visit these third-party sites, you should review their privacy policies to ensure you understand and are comfortable with their practices concerning your information. We do not accept, and do disclaim, any responsibility for the privacy policies and information collection, use, and sharing practices of any third-party website (whether or not such site is linked on or to the Sites). These links are provided to you for convenience purposes only, and you access them at your own risk.

Some of our third-party partners may ask you to provide personal information on their websites. They may share such personal information with us, as governed by their respective privacy policies.

The third-party partners from which we receive personal information include web hosting providers. We receive information related to name, occupation, address, and contact information from third-party partners. Our use of information received from such a third party will be dictated by the third party's privacy policy and not this Privacy Policy.

We will link the information that we collect automatically with the information you provide us, and we will combine the information we collect online with information we collect offline or that is collected by third-parties.

B. How We Use the Information We Collect

We use information we collect about you primarily to: provide services to you in accordance with any contract with you, communicate with you, and manage and improve our services for you and our other investors, as permitted by applicable laws.

We use your personal information to:

- respond to your requests for forms, literature, or information, on the basis that it is in our

business interests to respond to your requests, and you have requested that we do this;

- manage and administer customer services, including but not limited to the administration of your customer account. In most cases, we do this to meet our contractual obligations to you. Where there is no such obligation, we have a business interest in keeping our records accurate and up to date, which will assist you when we provide our services;
- process transactions, as necessary to meet our contractual obligations to you;
- provide you with the services you have requested. In many cases we will provide these services to comply with contractual obligations to you, but if these services are not governed by any contract, we will use your information in this way to meet our business interests in providing the best service possible;
- prepare investor disclosure materials. This is necessary to comply with our legal obligations, to meet our interests in managing our business effectively, and for informing you and our other investors about how we are meeting your expectations;
- improve the Sites and learn about how visitors use the Sites. This is necessary for us to improve the services we offer through the Sites, and benefits you as it helps us make the Sites more usable and appealing;
- communicate with you about our products and services, including providing you with information about features on the Sites and possible changes to our Privacy Policy or terms of use. If required by applicable law, we will only send these messages on the basis that you have consented, or otherwise it will be to meet our business interests in providing information to our investors about new products and features. You can opt out of receiving marketing communications at any time;
- comply with legal obligations; and
- protect our rights, your rights, and the rights of others, as this may be necessary to meet our high standards of business practice.

We may use information for any purpose if the information does not identify you and cannot be combined with other information accessible to us to identify you. For example, we may prepare aggregated reports about how visitors tend to interact with the Sites for research about the use of the Sites and how the Sites could be improved, from which your interactions with the Sites cannot be singled out.

C. How We Share the Information We Collect

1. In Connection with Third Party Offers

We may share information about you with third-parties when you engage in certain activities on the Sites that are sponsored by third-parties. For example, you may choose to purchase products or services offered by a third-party or elect to receive information or communications from a third-

party. If you engage in such third-party offerings, we may share information (e.g., your e-mail address) with third-parties in association with the offerings.

We disclose this information to third-parties for the purposes and on the basis described above (see Section B), for example, to process your transactions and to respond to your requests for information or communications from third-parties.

2. Service Providers

Sometimes we engage companies that act on our behalf in association with the operation of the Sites. For example, such companies may deliver products or services, improve the functionality of the Sites, collect information about you, communicate with you, or store information for us. In some cases, these companies may need to access information about you.

Except as otherwise disclosed in this Privacy Policy or as otherwise communicated to you, Horizon Realty Management Inc. takes reasonable steps to require these companies to collect, store, and use information about you only on our behalf and in accordance with this Privacy Policy. We share personal information with service providers on the basis that it is necessary to meet our legitimate interests in efficiently managing our business and for developing future business.

3. Analytics Providers

We engage third-party analytics providers to help us understand how users engage with the Sites. These third-parties may use cookies and similar technologies to collect information about your use of the Sites as well as information about your use of other websites over time.

The third-party services we use may include, but may not be limited to: Google Analytics and Adobe, which may provide you with choices about how they collect and use information. As described above, we share personal information with analytics providers on the basis that it is necessary to meet our legitimate interests in efficiently managing our business and for developing future business.

4. Additional Sharing Practices

From time to time we share your information with our affiliates and subsidiaries, or with our attorneys, banks, auditors, securities brokers, and other service providers in connection with the purposes described above. From time to time, we partner with other organizations or companies to provide co-sponsored or co-branded promotions, services, or events, and we will share your information with our co-sponsor(s) and partners to the extent necessary for the partnership to function.

We may disclose information when we believe in good faith that such disclosures:

- are required by law, including, for example, to comply with a court order or subpoena, or in response to a law enforcement agency's request;
- will help to protect our rights or enforce our Terms of Use;
- will support our detection, prevention, or response to fraud or intellectual property infringement;
- will help protect your safety or security, including the safety and security of property that belongs to you; and

-will protect the safety and security of the Sites, databases, and/or third-parties, including the safety and security of tangible and/or intangible property that belongs to us or to third-parties.

We may also share information about you to the extent reasonably necessary to proceed with the consideration, negotiation, or completion of a merger, reorganization, or acquisition of our business, or a sale, liquidation, or transfer of some or all of our managed assets.

The above-described disclosures are provided on the basis that they are either necessary to comply with our legal obligations or they are necessary to meet our legitimate interests in managing our business efficiently and for developing future business.

Additionally, we reserve the right to share with third-parties information that does not identify you (and cannot be combined with other information accessible to us to identify you) for any purpose.

We do not sell your personal information and have not done so in the last 12 months from the effective date of this policy.

D. The Security Measures We Take to Safeguard Information

The security and confidentiality of the information we collect or receive is extremely important to us, and we take our responsibility to protect this information very seriously. We have implemented commercially reasonable technical, administrative, and physical security measures to protect the information that we collect or receive. From time to time, we review and consider updates for our security procedures. Please be aware that, despite our ongoing efforts, no security measures are perfect or impenetrable.

E. Updating Your Contact Information

You may update your contact information and/or modify your communication preferences by sending us an e-mail at admin@horizonfl.com. Additionally, we may provide tools on the Sites that facilitate such updates or modifications.

F. Children's Information

The Sites are intended for use by those over 18, and minors under the age of 13 may not use the Sites.

We do not knowingly solicit or collect personal information on the Sites from children under the age of 13. If we learn that, despite these measures, a child under the age of 13 has submitted personally identifiable information to us through the Site, we will take reasonable measures to delete such information from our records and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required by law).

G. Do Not Track

Your browser and other mechanisms may permit you to send do-not-track signals or other similar signals to express your preferences regarding online tracking. We do not currently respond to such signals.

Third-parties, such as our analytics providers, may collect data that relates to you on the Sites, across time, and over other websites. We cannot control third-parties' responses to do-not-track signals or other such mechanisms. Third-parties' use of data relating to you and responsiveness

to do-not-track signals is governed by their respective privacy policies.

H. Your Choices and Rights

If you no longer wish to receive marketing materials from us, you can let us know by contacting us at admin@horizonfl.com or using other unsubscribe features that we provide in our marketing communications.

Subject to local law, you may have certain additional rights regarding your personal information.

These may include the following rights to: access your personal information; rectify the information we hold about you; erase your personal information; restrict our use of your personal information; object to our use of your personal information (as described above); receive your personal information in a usable electronic format and transmit it to a third-party (also known as the right of data portability); and lodge a complaint with your local data protection authority, and withdraw any consent you have given to uses of your personal information. If you would like to discuss or exercise the rights you may have, please contact us at admin@horizonfl.com.

We will not discriminate against you for exercising any of these rights, for example, by charging a different price or denying goods or services.

How to Exercise Data Subject Rights

If you would like to discuss or exercise the rights you may have, contact us at admin@horizonfl.com. We will review your request and respond accordingly. The rights described herein are not absolute, and we reserve all of our rights available to us at law in this regard.

If you make a request related to your rights, we will need to verify your identity. To do so, we will request that you match specific pieces of information you have provided us previously, as well as, in some instances, provide a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If it is necessary to collect additional information from you, we will use the information only for verification purposes and will delete it as soon as practicable after complying with the request. For requests related to particularly sensitive information, we may require additional proof of identification.

If you make a request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf.

We will process your request within the time provided by applicable law.

I. Shine the Light Disclosures

If you are a California resident, you have the right to request certain information from us regarding the manner in which we share with third-parties certain categories of information that identifies you for the third-parties' direct marketing purposes. If you wish to exercise this right, please e-mail us at admin@horizonfl.com. For additional information about your rights under the CCPA and how to exercise those rights, refer to "Your Choices and Rights" in Section H above.

J. Where Is Information Processed?

We process information collected via the Sites in and subject to the laws of the United States, which may not provide the same level of protection for your information as your home country. The information may be available to the United States government or its agencies under a lawful order made in the United States. In addition, we may transfer your information outside the United States to our affiliates, business partners, and service providers located in other countries.

K. How Long Is Information Retained?

We retain your personal information for as long as we have a relationship with you and a period after our relationship with you has ended.

When deciding how long to keep your personal information after our relationship with you has ended, we take into account how long we need to retain the information to fulfill the purposes described above and to comply with our legal obligations, including obligations to financial services regulators. We may also retain personal information to investigate or defend against potential legal claims in accordance with the limitation periods of jurisdictions where legal action may be brought.

L. CCPA Categories of Personal Information Collected

The CCPA requires us to provide additional information about the personal information we collect with reference to specific categories of information. For additional information about our sources of personal data, how we use personal data, and how we disclose personal data, refer to Sections A-C above.

Within the last twelve months, we have collected the following categories of personal information from California residents:

Category

Examples

Identifiers

Name, postal address, e-mail address, telephone number, facsimile number, IP address, username and password, or other similar identifiers

Personal information categories listed in the California Customer Records statute (Cal. Civ Code § 1798.80(e))

Name, postal address, telephone number financial information

Commercial Information

Products or services purchased, obtained, or considered, or investor status

Internet or other similar network activity

Information on a consumer's interaction
with our Sites.

M. Amendments to this Privacy Policy

We may change this Privacy Policy from time to time. Should we do so, we will post the changes to this page. We suggest that you periodically consult this Privacy Policy to review any changes. Your continued use of the Sites after the effective date of any modification to the Privacy Policy will be deemed to be your agreement to the changed terms.

This policy is effective from November 3, 2022.

N. How to Contact Us

If you have any questions regarding this policy or our privacy or data protection practices, please feel free to contact us at admin@horizonfl.com.