

STEWARD+HELM

PRIVACY POLICY

Effective Date: August 12, 2024

Introduction and Scope

Steward + Helm, a subsidiary of Lurin Advisors, LLC (“**S+H**”, “**we**”, “**us**”, or “**our**”), respects the privacy of our website visitors (referred to as “**you**” or “**your**”). Through our stewardandhelm.com website (“**Website**”) we provide information on our services and communities, and enable you to schedule a tour, and apply to be a resident (collectively, “**Services**”). This privacy policy (as posted on our Website at www.stewardandhelm.com/privacy-policy and as amended from time to time and effective as of the date posted) (“**Privacy Policy**”) describes the types of information we may or do collect from you or that you may provide when you visit or use our Website or use our Services, and our practices for collecting, using, maintaining, protecting, disclosing, retaining, and transferring that information. This Privacy Policy applies to the data collected by us, or those working on our behalf, through information you enter or from the data imported from sources authorized or approved by us. It does not apply to data collected through third-party websites, or to products, or services not approved by us.

Acknowledgement and Consent

By visiting our Website or using our Services in any manner, you acknowledge that you accept the terms, practices and policies described in this Privacy Policy (and as updated from time to time), and you hereby consent that we may collect, use, process, share, retain, and transfer your information as described herein. If you do not agree with our policies and practices, your choice is not to use our Website or our Services. Your use of our Website and our Services is at all times subject to our Terms of Use (available at stewardandhelm.com/terms and as amended from time to time and effective as of the date posted (the “**Terms**”)), which is incorporated by reference herein. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms.

Changes to Our Privacy Policy

We are constantly working to improve our Website and Services, and we may need to change this Privacy Policy from time to time as well. Our current Privacy Policy will always be on our Website and any updates will be effective upon posting. You are responsible for periodically checking our Website for updates. Under certain circumstances, we also may elect to notify registered Users of changes or updates to this Privacy Policy by additional means, such as posting a notice on the Website or by sending you an email, but you should not rely on receiving such additional notice.

If you use our Website or our Services after any changes to the Privacy Policy have been posted, you agree to the new Privacy Policy. Our practices regarding information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

What Information Does This Privacy Policy Cover?

This Privacy Policy covers our treatment of your personally identifiable information. “**Personal Information**” generally refers to any unencrypted or non-deidentified information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular person. However, the definition of Personal Information may vary depending on the state or country in which you reside, and that state’s or country’s definition will apply to your

Personal Information in the context of this Privacy Policy. Please see additional information below on the particular information we may collect.

This Privacy Policy does not cover Personal information that our resident management Service Provider collects as part of the resident application process.

Personal Information does not include information publicly available from government records or information excluded by applicable law. Personal Information also does not include your Personal Information that has been deidentified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (collectively, all of the foregoing in this sentence being referred to as “**De-Identified Personal Information**”).

We also may collect Personal Information from you through means other than our Website. This may include offline collection, such as if you submit a paper application, make a payment by check, or call or visit our office. It also may include emails, text messages, or other electronic communications that you send to us separate from our Website or by way of our Service Providers (as defined herein). However, if we combine the Personal Information we collect from you outside of our Website with Personal Information that is collected through our Website or by another means as described above, the Privacy Policy will apply to the combined information, unless specifically disclosed otherwise.

If, for example, you are applying for employment, either via our Website at our careers portal, or offline, we or our service providers may obtain information from you and/or third parties about membership, licensing, accreditation, certification, professional, and/or employment as part of a background check, among other information, as part of the application process.

Other than as stated herein, this Privacy Policy does not apply to information collected by any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our Website. We are not responsible for the practices of sites linked to or from our Website, and before interacting with any of these sites you are advised to review their rules and policies before providing them with any private information.

Individuals under the Age of 18

We do not knowingly collect, solicit or maintain Personal Information from anyone under the age of 18 or knowingly allow such persons to register for or use our Services. If you are under 18, please do not send any Personal Information about yourself (such as your name, address, telephone number, or email address) to us. In the event that we learn that we have collected Personal Information from a child under age 18 without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database. Please contact us if you have any concerns.

Personal Information We Collect

We may collect several categories of Personal Information from and about you as summarized in the following table:

Category	Specific Items of Personal Information
Identifiers	<ul style="list-style-type: none"> • first and last name • user name (which may include first and last name) • email address • postal address • zip code • unique personal identifier, e.g.: phone number
Demographic	<ul style="list-style-type: none"> • birth date, national origin, country of residence
Biometric information based on characteristics	<ul style="list-style-type: none"> • image and likeness
Internet or other electronic network activity; device information	<ul style="list-style-type: none"> • type and manufacturer of device and its ID/UDID or similar device-specific code • operating system and platform • Internet service provider or mobile carrier's name, connection speed, and connection type • browsing, session, interaction, and search history related to our Website • cookies • browser type, language, and version • screen resolution • domain name system requests • date stamp and URL of the last webpage visited before visiting our Website, and URL of the first page visited after leaving our Website • pages viewed, time spent on a page, click-through and clickstream data, queries made, search results selected, comments made • type of service requested
Professional or employment information	<ul style="list-style-type: none"> • email address that identifies you (e.g., jane.r.smith@website.com versus jrs@website.com) • employer, employment history, information from professional references, work experience

How We Collect Personal Information and from What Sources

Information You Provide Us. The Personal Information we collect through our Website, or from our distributors, resellers, representatives, business partners, service providers, affiliates, divisions, subsidiaries, exhibitors, and sponsors may include the following:

- Information that you provide by filling in webforms on our Website. This includes information provided when creating an online account, using our Services, subscribing to our e-newsletters or other communications, requesting information from us, submitting or posting material (where permitted) on our forums, or interacting with customer support or

service, report a problem with our Website or Services, or otherwise communicating with us.

- Records and copies of your correspondence (including email addresses), if you contact us
- Registering for an event
- Your responses to surveys that we or our Service Providers might ask you to complete for research purposes
- Your search queries on the Website
- When communicating with customer service/support
- Third-party websites and mobile applications (e.g., websites that share information with us or advertising partners regarding online activities)
- Information from
 - data suppliers (e.g., companies that provide demographics and other information regarding consumers)
 - joint marketing partners
 - online advertising companies
 - mailing list providers
 - fulfillment and delivery service providers
 - social media companies
 - other Service Providers
- Responding to employment opportunities

Careers Website Portal. Our Careers Website portal (available [here](#)) has information about employment opportunities with us, and contains a link which directs you to our Service Provider’s website (but which may contain our brands) through which you can submit an application for employment. This application will request certain Personal Information of you. That Service Provider’s website has its own terms of use and privacy policy which you should review prior to submitting any Personal Information through that website. We may be provided your application, including some or all of the Personal Information (and other information) you submit.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including the following:

- Details of your visits to our Website, including, but not limited to, website traffic data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer, mobile device, and internet connection, including your IP address, operating system, browser type, clickstream patterns, the URL of the most recent website you visited before coming to our Website, the amount of time you spent on our Website, and the pages you viewed while on our Website.

Behavioral Tracking. We do not allow personalized third-party behavioral tracking, though we may use De-Identified Personal Information to track users’ click or browsing patterns.

The information we collect automatically is statistical data and may include Personal Information, and we may maintain it or associate it with Personal Information we collect in other ways or

receive from third parties. It helps us to improve our Website and to deliver better and more personalized Services, including, but not limited to, by enabling us to: estimate our audience/visitor size and usage patterns, store information about your preferences, allowing us to customize and improve our Website, speed up your searches, and/or, recognize you when you return to our Website.

Location Analytics. We may use our or a third party's mobile app which may include functionality which, in certain cases, allows our attendees to identify their location at the event. App users choose to use the app anonymously or to login as an identified user, in which case the Personal Information provided upon registration may be used. Information such as IP address, device ID and location may be gathered.

Cookie Notice and Policy. The technologies we use for automatic data collection may include cookies, local storage cookies, web beacons, pixel tracking, GIF, IP address, and other technologies. Each of these is discussed below.

Browser Cookies

Browser cookies are small files placed on the hard drive of your computer or mobile device. They may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Browser cookies are managed by the web browser (Chrome, Microsoft Edge, Safari, etc.) on your computer or mobile device. Different types of cookies which have different purposes are used on our Website.

Essential Cookies

Essential cookies are essential to allow you to browse our Website and use its functions. Without them, services such as shopping baskets and electronic invoicing would not be able to work.

Performance Cookies

Performance cookies collect information on the use of our Website, such as which pages are consulted most often. This information enables us to optimize our Website and simplify browsing. Performance cookies also enable our affiliates and partners to find out whether you have accessed one of our Website pages from their site and whether your visit has led to the use of a Service from our Website, including the references for the Service purchased or used. These cookies do not collect any information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.

Functionality Cookies

Functionality cookies enable our Website to remember the choices you have made when browsing. For example, we can store your general geographic area (but not precise geolocation) in a cookie so that the Website corresponding to your geographic area is shown. We can also remember your preferences, such as the text size, font, and other customizable aspects of the Website. Functionality cookies also may be able to keep track of the products, pages, or videos consulted to avoid repetition. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.

It is possible that you will come across third-party cookies on some pages of sites that are not under our control.

We also use cookies such as functionality cookies to implement tracking technology on our Website. This allows us to display advertising that is tailored to you on our Website, to understand which parts of our content interest you the most, and which Service categories you request. This tracking uses De-Identified Personal Information data. Some of our service providers are allowed to place cookies on our Website. Those companies also may provide you with the option of preventing the use of cookies in the future. For more information, contact the relevant third-party provider.

At any time, you can prevent the use of cookies in the future. You may activate the appropriate setting in your browser to refuse to accept browser cookies. However, if you do, your experience on our Website may be affected; e.g., you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

Local Storage Cookies

Certain features of our Website may use local stored objects to collect and store information about your preferences and navigation to, from and on our Website. Local storage cookies are not managed by the same browser settings as are used for browser cookies.

Web Beacons. Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count visitors who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Pixel Tracking. In addition to using cookies, the Website may employ “pixel tracking,” a common process which may be used in connection with advertisements on other sites. Pixel tracking involves the use of pixel tags that are not visible to the user and consist of a few lines of computer code. Pixel tracking measures the effectiveness of advertisements and compiles aggregate and specific usage statistics. A “pixel tag” is an invisible tag placed on certain pages of websites that is used to track an individual user’s activity. We may access these pixel tags to identify activity and interests that may allow us to better match our Services with your interests and needs. For example, if you visit our Website from an advertisement on another website, the pixel tag will allow the advertiser to track that its advertisement brought you to the Website. If you visit our Website, and we link you to another website, we also may be able to determine that you were sent to and/or transacted with a third-party website. This data is collected for use in our marketing, research, and other activities.

GIF. We may use tiny images known as clear GIFs to track behavior of users, including statistics on who opens our emails.

IP Address. Our servers (or those of our service providers) automatically record certain log file information reported from your browser when you access the Website. These server logs may include information such as which pages of the Website you visited, your internet protocol (“IP”) address, browser type, and other information on how you interact with the Website. These log files are generally deleted periodically.

Information We Collect from Third Parties

We may collect information that others provide about you when you use the Website, or obtain information from other sources and combine that with information we collect through the Website.

- **Third-Party Services.** If you link, connect, or login to your account with a third-party social media service (e.g., Facebook, Google, Instagram, Yelp, etc.), the third-party service may send us information such as your registration and profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Employment and Background Information.** For job applicants in the United States, to the extent permitted by applicable laws, we may obtain reports from public records of criminal convictions or sex offender registrations. You agree to and do hereby consent to our use of such information, including your full name and date of birth, to obtain such reports
- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or fraud detection information, from third-party Service Providers and/or partners, and combine it with information we have about you. For example, we may receive background check results or fraud warnings from Service Providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the Website through partnerships, or about your experiences and interactions from our partner ad networks. Other examples of such providers include, but are not limited to, backend processing, fulfillment, automation, certification, video hosting platform, email management, authentication, form processing, website usage tracking, managing calendar invites and scheduling, and database hosting and management.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website is served by third parties, including advertisers, ad networks and servers, content providers and application providers. First-party or third-party cookies may be used alone or in conjunction with web beacons or other tracking technologies to collect or compile information regarding user interactions with ad impressions and other ad service functions as they relate to our Website. A first-party cookie is a cookie set by the domain name that appears in the browser address bar. A third-party cookie is a cookie set by (and on) a domain name that is not the domain name that appears in the browser address bar. It might be set as part of a side resource load (image, JS, iframe, etc., from a different hostname) or an AJAX HTTP request to a third-party server. The information that first-party and third-party cookies collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services (i.e., tracking such activities). They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Website. More information on how to opt-out of third-party advertiser tracking mechanisms is available [here](#).

Google Tools. We use tools provided by Google as described below.

Google Analytics. We use, and/or some of our third-party Service Providers may use, Google Analytics or other analytics service to help us understand the use of our Website and Services. Google Analytics is a web analysis service provided by Google. Google utilizes data it collects to track and examine the use of our Website to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. The Personal Information collected and processed may include cookies, usage data, and other internet information. Such Service Providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.

Google Maps/Google Earth. We also use Google Maps (including the Google Maps API(s)) and/or Google Earth, which may, among other things, request access to your geolocation, and both of which are subject to their own terms of use and privacy policy.

Google Tag Manager. We use Google Tag Manager to gain insights from activities such as conversion events, file downloads, and page scroll depth. To learn more about Google Tag Manager, please visit [here](#).

Google Maps/Google Earth. We also use Google Maps (including the Google Maps API(s)) and/or Google Earth, which may, among other things, request access to your geolocation, and both of which are subject to their own terms of use and privacy policy.

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

For any comments, reviews, or other content regarding us that you post on our Facebook or other social media sites, or on other websites, e.g., Google, Yelp, Trip Advisor, Instagram, etc. (collectively, “**Content**”), you agree to and do hereby grant us and our licensors, affiliates, partners, successors and assigns, a nonexclusive, perpetual, irrevocable, worldwide, sublicensable, transferrable, royalty-free right and license to use, store, publicly display, perform, publish, transmit, transfer, distribute, translate, reproduce, rearrange, edit, redact, modify, aggregate, summarize, abstract, adapt, and create derivative works of the Content that you post or otherwise submit to us for any purpose, in any form, medium, or technology now known or later developed.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information, for one or more of the following purposes:

- To present to you our Website and contents and provide information and notices (e.g., updates) related thereto.
- To provide you with Services and information related thereto that you request from us and your related questions.
- To provide customer Service and support.
- To send you emails and newsletters with company and other information and offers.
- To allow you to participate in interactive features on our Website.
- To ask for ratings and reviews and request your participation in surveys, polls, focus groups, trials, or other initiatives which help us to gather information used to develop and enhance our Services.
- To de-identify, aggregate, anonymize, etc., your Personal Information or other data..

- For internal purposes, such as Website, Service, and system administration or internal audits and reviews.
- To our affiliates, subsidiaries, divisions, and/or our members of our family of companies
- To comply with applicable law(s) (e.g., to comply with a search warrant, subpoena or court order) or to carry out professional ethics/conduct investigations.
- In any other way we may describe and for which we obtain your consent when you provide the information.

We will not collect additional categories of Personal Information or use the Personal Information we collect for materially different, unrelated, or incompatible purposes without providing you notice thereof.

We use cookies, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Website; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Services; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; and/or, (f) help you efficiently access your information after you sign in.

Text Messages. The following paragraph applies only to residents as applicants for leasing, renewals, or maintenance service requests. Our Services may include sending you Short Message Service (“SMS”) messages, which may deliver up to two messages per day to your cellphone or other wireless device (unless you communicate further with us and we need to or can respond), but message frequency may vary. We may use your information to contact you about your application for leasing, renewal, or maintenance service requests. You may request us to stop sending text messages by replying “STOP” to the SMS text message you received. After you send the SMS message “STOP” to us, we will send you a SMS message to confirm that you have been unsubscribed. Alternatively, you may submit your request by email to us, including the email address and phone number you registered with us, or by any reasonable means. After this, you will no longer receive SMS messages from us. If you want to join again, just sign up as you did the first time and we will start sending SMS messages to you again. For help, please reply to a text with HELP. Message and data rates may apply, depending on your cell phone plan. Carriers are not liable for delayed or undelivered messages.

Disclosure of Your Personal Information

We may or do disclose your Personal Information, in whole or in part, to the following types of third parties, and for one or more of the following purposes:

Type of Third Party	Purpose
Data storage or hosting providers	Secure storage and transmission of your data
Database and software service providers	Management and tracking of your data
Legal and compliance consultants, such as external counsel, external auditors, or tax consultants	Provide professional services to us
Identity management providers	Authentication purposes
Payment solution providers	Secure processing of payments you provide to us
Fulfillment and shipping vendors	Fulfillment and delivery of Services
Survey and research providers	Perform surveys or studies on our behalf
Advertising partners, including social media providers	Deliver targeted advertisements
Technology providers	Assist in the development and management of our Website

Unrelated third-party list renters	One-time mail or email approved by us
------------------------------------	---------------------------------------

Disclosures to Service Providers. We may disclose your Personal Information to third parties for the purpose of providing or improving the Services to you. We may disclose your Personal Information to third-party service providers which perform services on our behalf (“**Service Providers**”). This includes, without limitation, Service Providers which provide services relating to: outbound and/or inbound communications, data analysis, credit checks, screening checks, collection services, marketing assistance, managing customer information, creating, hosting, and/or providing customer or support services on our behalf, delivering packages, sending postal mail and email, removing repetitive information from customer lists, providing search results and links (including paid listings and links), processing credit card payments, or for other purposes. These Service Providers may have access to your Personal Information in order to provide these services to us or on our behalf. If we engage Service Providers for any of the foregoing, use of your Personal Information will be bound by obligations of confidentiality and their use of Personal Information will be restricted to providing their services to us. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting Service Providers).

Required Disclosures. Except as otherwise described in this Privacy Policy, we will not disclose your Personal Information to any third party unless required to do so by law, court order, legal process (e.g., subpoena), including, but not limited to, in order to respond to any government, regulatory, or licensing request, or if we believe that such action is necessary to: (a) comply with the law, comply with legal process served on us or our affiliates, subsidiaries, service providers, or partners, or investigate, prevent; (b) enforce our Terms or customer agreement (including for billing and collection purposes); (c) take precautions against liability; (d) investigate and defend ourselves against any third-party claims or allegations or to investigate, prevent, or take action regarding suspected or actual illegal activities; (e) assist government enforcement agencies or to meet national or other security requirements; (f) to protect the security or integrity of our Website or Services; or, (g) exercise or protect the rights, property, or personal safety of us, our users or others. We will attempt to notify you, where reasonably practicable, about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law or regulation, or (ii) we believe that providing notice would be futile, ineffective, create a risk of harm to an individual or group, or create or increase a risk of acts of fraud done upon us or our users. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no risk scenarios described in this paragraph apply.

Disclosure of De-Identified Personal Information. We may share De-Identified Personal Information with third parties for any purpose except as prohibited by applicable law, including, but not limited to, the following. De-Identified Personal Information or non-Personal Information may be aggregated for system administration and to monitor usage of the Website. It may be utilized to measure the number of visits to our Website, average time spent, number of pages viewed and to monitor various other Website statistics. This monitoring helps us evaluate how visitors use and navigate our Website so we can improve the content. We may share De-Identified Personal Information or anonymous information (including, but not limited to, anonymous usage

data, referring/exit pages and URLs, IP address, platform types, number of clicks, etc.) with interested third parties in any way we choose and for any purpose.

Your Consent to Disclosure/Transfer/Sale of Your Personal Information. You consent to (and shall not object) our disclosure, transfer, and/or sale of your Personal Information, De-Identified Personal Information, and other information you provide to us, as well as the rights you have granted or consented to in this Privacy Policy (collectively, “**Transferred Information**”) to a potential or actual buyer or acquirer of assets or equity of our company or other successor for the purpose of considering or undergoing a merger, divestiture, restructuring, reorganization, dissolution, change in control, or sale or transfer of some or all of our assets (each of the foregoing referred to as a “**Transfer**”), whether as a going concern or as part of bankruptcy, liquidation or other court proceeding, in which Personal Information held by us is among the assets transferred. We cannot make any representations regarding the use or transfer of Transferred Information that we may have in the event of our bankruptcy, reorganization, insolvency, receivership, or an assignment for the benefit of creditors. Furthermore, except as required by law, we are not and will not be responsible for any breach of security by any third parties or for any actions of any third parties that receive any of the Transferred Information that is disclosed to us.

Security

We have implemented technical, administrative, and organizational security measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, destruction, alteration and disclosure. Your Personal Information is stored behind secured networks and a firewall and is only accessible by our personnel and by a limited number of Service Providers who have special access rights to our systems, and who are required to keep the information confidential. Our Website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Website safe.

Any payment transactions involving credit or debit cards will be performed using our third party payment processors or gateways, who will use appropriate security procedures designed to protect your information. We do not collect or store full credit card numbers.

Our agents, contractors, Service Providers, and partners who require access to your Personal Information in order to provide services to us or to you on our behalf are also required to keep the information confidential in a manner consistent with this Privacy Policy and are not permitted to disclose the information to third parties or use the information for any purpose other than to carry out the services they are performing for us, or as permitted pursuant to our agreement with them.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do use security measures designed to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to us or which we obtain. Any transmission of Personal Information is at your own risk. Unauthorized entry or use, or hardware or software failure, and other factors, may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

The safety and security of your information also depends on you. You should maintain good internet security practices. Where you have password-protected access to an account or certain parts of the Website or Services, you are responsible for keeping this password confidential. Please help keep your account safe by using a strong password, or, better yet, a strong pass phrase. You

should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or mobile device and browser by signing off after you have finished accessing your account. If your email account is compromised this could allow access to your account with us if you have given up those details and/or permitted access through those accounts. If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. If you think that your account has been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. The information you share in public areas may be viewed by other users. We will never email you to ask for your password or other account login information. If you receive such an email, please send it to us so we can investigate.

The safety and security of platform login information also depends on you. You are responsible for keeping confidential all login credentials to our Website to which you are provided access. You agree to not disclose any such login credentials with any third party. If you become aware of any potential compromise of your login credentials, you must immediately change the relevant password. You agree to and do hereby release and forever discharge us and our affiliates, subsidiaries, parents, officers, directors, employees, successors, assigns and contractors (collectively, “**Company Group**”), and you will indemnify, defend, and hold Company Group harmless, from any and all past, current, and future liability, claims, demands, damages, losses, fines, penalties, assessments, private rights of action, or other actions, of whatever kind of nature, either in law or equity, as well as costs (including, but not limited to, attorneys’ fees and costs), which arise from any failure of you to maintain the security of your email or other accounts which results in unauthorized access by a third party to such account and the transfer of funds by us in reliance of instructions purporting to originate from you.

Data Retention

In general, our retention of Personal Information is reasonably necessary and proportionate to achieve the purposes for which the Personal Information was collected or processed, or for another disclosed purpose that is compatible with the context in which the Personal Information was collected, and not further processed in a manner that is incompatible with those purposes. We will retain your Personal Information for as long as your account is active, or as long as you are an account holder or user of our Services or for as long as we have another business purpose to do so (such as, but not limited to, for business, tax, or legal purposes) and, thereafter, for no longer than is required or permitted by law, or our records retention policy, reasonably necessary for internal reporting and reconciliation purposes, or to provide you with feedback or information you might request. This period of retention is subject to our review and alteration. We will also retain Usage Data for analytics purposes. “**Usage Data**” refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit). Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Following termination or deactivation of your user account, we may retain your profile information and all information posted to public areas of the Website. Following termination or deactivation of your user account, we may retain your Personal Information and other data, but will maintain it as confidential according to the Terms, this Privacy Policy, and as required by applicable law. We

have the right to delete all of your Personal Information and other data after termination of your user account without notice to you.

We may retain De-Identified Personal Information for as long as we deem appropriate.

What Information You Can Access, Change, or Delete

Through your user account settings page, you may access and, in some cases, edit, or delete certain information you have provided to us, such as name and password, email address, address, user profile information, etc. The information that you can view, update, and delete may change as the Website or Services or our practices change. If you have any questions about viewing or updating information we have on file about you, please contact us.

Privacy Notice for Residents of Certain States

Certain states provide (as of the effective date of this Privacy Policy) residents of that state with additional rights, which, for certain states, are summarized in the table below:

Privacy Notice of Rights in Certain States (updated 7/2024)

Right	Description of Right	California	Colorado	Connecticut	Texas	Utah	Virginia
Access	Right to access a copy of your Personal Information held by us right to know what Personal Information has been collected, from where, and why,	Yes, other than trade secrets	Yes, other than trade secrets	Yes, other than trade secrets	Yes	Yes	Yes
Correction	Right to have inaccuracies in your Personal Information to be corrected	Yes	Yes	Yes	Yes	No	Yes
Deletion	Right to request deletion of your Personal Information held by us	Yes, of consumer-provided data only	Yes	Yes	Yes	Yes, of consumer-provided data only	Yes
Opt out of sale or sharing	Right to request information about the categories of Personal Information we sell or share (if any) and data we share with third parties (the foregoing of which is described above in this Privacy Policy)	Yes	Yes	Yes	Yes	Yes	Yes
Opt out of targeted advertising	Right to opt-out of the use of automated decision-making technology, including profiling	Yes	Yes	Yes	Yes	Yes	Yes
Opt out of profiling	Right to opt-out of our use of profiles	Yes	yes	Yes	Yes	No	Yes
Limit use and disclosure of sensitive Personal Information	Right to limit our use of sensitive Personal Information we collect (if any) to what is necessary to perform the services or provide the goods	Yes	Yes	Yes	Yes	Yes	No

Right	Description of Right	California	Colorado	Connecticut	Texas	Utah	Virginia
	reasonably expected by an average consumer						
Data portability	Right to transmit your Personal Information to another business	Yes	Yes	Yes	Yes	Yes, for consumer-provided data only	Yes, for consumer-provided data only
Nondiscrimination	We will not discriminate against you simply for your exercising any of your rights	Yes		No	Yes		Yes
Appeal	Right to appeal our decision (if we decline to honor your request; likely due to an exception in the law)	No	Yes	No	Yes	No	Yes

The categories of your Personal Information we collect are listed above in the section entitled “Personal Information We Collect.” The purposes for which the categories of Personal Information are or may be used is described above in the section entitled “How We Use Your Information” and in other sections of this Privacy Policy.

Data Access and Portability Right

For residents of states in which we have statutory obligations regarding data access requests, and unless a statutory exemption applies, where applicable you have the right to request no more than twice in a 12-month period that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable Consumer request, we will disclose to you:

- The categories of Personal Information we collected about you
- The categories of sources for the Personal Information we collected about you
- Our business or commercial purpose for collecting that Personal Information
- The categories of third parties with whom we share that Personal Information
- The specific pieces of Personal Information we collected about you (also called a data portability request) and provide a copy to you in an electronic or paper format
- If we disclosed your Personal Information for a business purpose, a list disclosing disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained

Deletion Request Right

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable Consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies (as described below).

Where and as permitted by applicable state law we may delete your Personal Information by (a) permanently and completely erasing the Personal Information on our existing systems with the

exception of archived or back-up systems; (b) de-identifying the Personal Information; or, (c) aggregating the Personal Information.

We may deny your deletion request if retaining the information is necessary for us or our Service Providers to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Correct Services or our Website to identify and repair errors or issues that might impair existing or intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal, regulatory or law enforcement obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

For Colorado, Connecticut, and Virginia Residents Only: If we deny your request, you may appeal our decision by submitting an appeal request. Within 45 days (for Colorado residents, or 60 days for Connecticut or Virginia residents) of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to your appeal. If the appeal is denied, you may file a complaint with the state Attorney General as follows: (a) Colorado – using their webform available at <https://coag.gov/file-complaint/>; (b) Connecticut – by email: attorney.general@ct.gov, or phone: 860-808-5420; or, (c) Virginia – by email: mailoag@oag.state.va.us, or phone: 804-786-2071.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, deletion and/or other rights described above (depending on which state you reside in), please submit a verifiable consumer request to us by: sending an email to us at info@stewardandhelm.com, using our webform available here: <https://www.stewardandhelm.com/contact-us>, calling us toll-free at (866) 208-4891, submitting a form in person, or by mailing a request to us at 2201 N Central Expressway Suite 260 Richardson, TX 75080, Attn: Privacy Request. Only you or a person registered with the state's Secretary of State office (where permitted) that you authorize to act on your behalf, may make a verifiable Consumer request related to your Personal Information. You also may make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period, or as permitted by applicable law. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Verification Process

Email Verification Method: Upon receiving a data access or deletion request from you we will send an email to you at the email address we have for you on file. The email will ask you to respond to verify you as the consumer making the request. Upon receipt of your verification we will match your information to that which is in our file. Upon verification of your identity we will proceed to process your request (subject to the exceptions stated above).

Webform Verification Method: When you submit a request using our webform (available here) we will match the information you submitted with the information we have for you on file. Upon verification of your identity we will proceed to process your request (subject to the exceptions stated above). We may not be able to comply with your request if (a) we are unable to verify your request, (b) if we are unable to match you with information in our database, or (c) if an exception under the law exists exempting us from complying with your request.

Response Timing and Format

Unless applicable state law requires otherwise, we will confirm receipt of your request within the applicable statutory time limit, if any, of receiving it. We will respond to a verifiable consumer request within the applicable statutory time limit, if any. If we require more time (up to an additional period as permitted by applicable statute), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to the email address associated with that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover 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. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Please note that this right does not apply if the disclosure of Personal Information is for purposes consistent with your reasonable expectations when considering the submission's circumstances.

Personal Information Sales Opt-Out and Opt-In Rights

If you are a resident in certain states, if you are 16 years of age or older, you have the right to direct us to not sell your Personal Information at any time (the "right to opt-out"). We do not sell the Personal Information of Consumers we actually know are less than 16 years of age, unless we

receive affirmative authorization (the “right to opt-in”) from either the Consumer who is between 13 and 16 years of age, or the parent or guardian of a Consumer less than 13 years of age.

Non-Discrimination

We will not discriminate against you simply for your exercising any of your rights available under state law. Unless permitted by applicable state law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including by refusing to grant discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or,
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Notices; Opting Out

If you prefer not to receive marketing-related communications from us, please let us know by clicking on the unsubscribe link within a marketing message or newsletter you receive, or by updating your email preferences under your profile, or by contacting us. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers. You cannot opt out of receiving Service-related notices by email unless you terminate your account.

By providing us with your phone number and/or email address (including by “following”, “liking”, linking your account to our Website or Service or other services, etc., on a third party website or network), you consent to our using the email address and/or phone number to send you Service-related notices by email, text, or by calling you, including any notices required by law (e.g., notice of data privacy or security incidents), in lieu of communication by postal mail. You also agree that we may send you notifications by email, phone, or text, of activity regarding our Services, the Website, your Personal Information, or any aspect of our relationship, to the email address or phone number you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages or content, such as, but not limited to, newsletters, additions or changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by emailing us your opt-out request or, where available, by clicking “unsubscribe” at the bottom of our e-newsletter. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers. You may not opt out of Service-related emails.

You can add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by emailing us. It is your responsibility to maintain your current email address with us.

Contact Information

If you have any questions about this Privacy Policy or our privacy practices, please contact us: by email at privacy@lurin.com; or, by mail at 2201 N Central Expressway Suite 260 Richardson, TX 75080, Attn: Privacy.

Where We Process and Store Personal Information

We have our headquarters in the United States. The Personal Information we or our service providers collect may be stored and processed in servers within or outside of the United States and wherever we and our service providers have facilities around the globe, and certain information may be accessible by persons or companies outside of the United States who provide services for us. You consent to our and our service providers' transmission and/or transfer of your Personal Information to, or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take reasonable steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it.

If you are a resident of a country other than the United States, you acknowledge and consent to our (and our Service Providers) collecting, transmitting, processing, transferring, and storing your Personal Information out of the country in which you reside.