



PRIVACY POLICY

The NRP Group LLC (“Company”, “we”, “us”, or “our”) respects your privacy and is committed to protecting it through our compliance with this policy.

This privacy policy (“Privacy Policy”) describes our privacy practices regarding information we collect from persons or entities (“you” or “your”) who access our website, or our related mobile applications that may be available for download (collectively, the “Site”).

PURPOSE. The Privacy Policy describes the types of personal information we may collect from you or that you may provide when you visit the Site and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Privacy Policy applies to information we collect when you visit the Site, in email, text, and other electronic messages between you and the Site. The Privacy Policy outlines the choices you have regarding our use of, and your ability to request, correct, or delete the personal information.

THE SITE IS NOT INTENDED FOR CHILDREN UNDER 16 YEARS OF AGE. THE COMPANY DOES NOT KNOWINGLY SOLICIT OR COLLECT PERSONAL INFORMATION ON THE SITE FROM CHILDREN UNDER THE AGE OF 16. IF YOU ARE UNDER THE AGE OF 16, DO NOT USE OR PROVIDE ANY INFORMATION ON THIS SITE. IF WE LEARN WE HAVE COLLECTED OR RECEIVED PERSONAL INFORMATION FROM A CHILD UNDER THE AGE OF 16 WITHOUT VERIFICATION OR PARENTAL CONSENT WE WILL TAKE REASONABLE MEASURES TO DELETE SUCH INFORMATION FROM ITS 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, OR AS MAY OTHERWISE BE REQUIRED BY LAW). IF YOU BELIEVE WE MIGHT HAVE ANY INFORMATION FROM OR ABOUT A CHILD UNDER THE AGE OF 16, PLEASE CONTACT US AT privacy@nrpgroup.com.

CALIFORNIA RESIDENTS UNDER 16 YEARS OF AGE MAY HAVE ADDITIONAL RIGHTS REGARDING THE COLLECTION AND SALE OF THEIR PERSONAL INFORMATION. PLEASE REFER TO YOUR CALIFORNIA PRIVACY RIGHTS NOTICE (BELOW) FOR ADDITIONAL INFORMATION.

POLICY CHANGES. PLEASE READ THIS ENTIRE PRIVACY POLICY CAREFULLY. The Company strives to help visitors of the Site protect their privacy while using our Site. The Company may amend this Privacy Policy from time to time. Should the Privacy Policy be modified in any way, the new Privacy Policy will be posted to this webpage. If we make any material changes to how we treat our users’ personal information we will notify you by a notice on the Site home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Site and this Privacy Policy to check for any changes.

TYPES OF INFORMATION COLLECTED. We collect several types of information from and about users of our Site: personally identifiable information and non-personally identifiable information. Personally identifiable information is information that identifies you or can be used to identify or contact you (“Personally Identifiable Information”). We also may collect information that by itself typically cannot be used to identify or contact you, such as demographic information (e.g. age, profession or gender), browser types, domain names, internet service providers, referring/exit pages, date/time stamp, operating system, clickstream data, information about you such as how you use the Site

and your communication preferences, and other anonymous statistical data involving the use of our Site (“Non-Personally Identifiable Information”).

Personally Identifiable Information we collect may include, but is not limited to: your name, email addresses, postal addresses, postal codes, user Internet Protocol (IP) addresses, social security/insurance number, driver’s license number, prior addresses, employers, job titles, income, telephone numbers, credit card information, bank account information and routing numbers, date of birth, gender, age, marital status, user name and password (if you choose to become a registered user of the Site or our products and services), emergency contact information, and other information either desirable or necessary to provide quality services to our customers and visitors. We may also collect information about you such as your use of the Site and communication preferences.

USE OF GOOGLE ANALYTICS AND OTHER TECHNOLOGIES.

This Site uses Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. (“Google”), to better assist Company in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer’s IP address. That information will be transmitted to and stored by Google. The information will be used to evaluate consumer use of the Site, compiling reports on Site activity for Company’s use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. The use of cookies by Google Analytics is covered by Google’s privacy policy: <https://www.google.com/policies/privacy/>.

HOW WE COLLECT AND USE INFORMATION. We may collect information in several ways through your use of this Site, as well as from forms you submit to us, personal correspondence, such as emails or letters that you send to us, information you include in a form you complete on the Site, or any other activity through which you identify yourself to us. When you visit the Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns including logging your IP address, the URL of your request and other information that is provided in the HTTP header. We may also ask you to voluntarily provide us with personal information on this Site. For example, while many of the features of the Site are available without registering, you may be asked to create an account on the Site if you desire to access certain features. Further, in some instances, we may ask you to provide personal information to perform screening services.

Company uses the information we collect about you or that you provide to us, including personal information to present our website and its contents to you. Company may use the information collected from you to provide services which you have requested from us. Company may use the information to fulfill any other purpose for which you provide the personal information. Company may use the information to notify you about changes to our website or any products, services, or features we offer or provide. We may also use your personal information to send you targeted messages, publications, news, and information about events, special offers, promotions and benefits. If you do not want us to use your information in this way, please modify your account settings.

EMAIL MANAGEMENT. You may receive emails from Company for a variety of reasons. We respect your desire to manage email correspondence. If you have an account with Company on the Site, you can select your preferences through your account settings. You can also manage your receipt of certain types of communication by following the instructions included in the email we send you.

SHARING OF INFORMATION COLLECTED. Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any information we gather from you on our Site.

We may share with third parties, including, without limitation, our corporate partners, aggregated demographic and statistical information that is not personally identifiable.

The Company may also disclose an individual’s personal information:

- To contractors, service providers, and other third parties we use to support our business and are bound by contractual obligations to keep personal information confidential and use it only for the business purpose for which we disclose it to them;
- To a person who in the reasonable judgment of Company is seeking the information as a verifiable agent of the individual;
- In situations where sharing or disclosing your information is required to offer you products or services you desire;

- To a third party or parties, where disclosure is required or permitted by law, a judicial proceeding, a criminal investigation, a court order, or legal process;
- If, in the reasonable judgment of Company, it is necessary to enforce compliance with our internal policies or the Terms of Use, to prevent illegal activity or suspected fraud, or to protect our Site, customers, or others; and
- To any other entity that acquires all or a portion of our organization by merger, reorganization, operation of law, or a sale of some or all of Company's assets.

The Company may be required to use or disclose your information in connection with a legal action or other proceeding, including without limitation, in response to a court order or a subpoena/summons. We also may disclose such information in response to a law enforcement agency's request.

HOW WE STORE YOUR INFORMATION. The Company is committed to protecting the security of any personal information you provide to us. We maintain commercially reasonable safeguards to maintain the security and privacy of personal information that you provide to us. In spite of these protections, the Company cannot guarantee the security of any data submitted over the Internet. After your information reaches Company it is protected by procedures and technology designed to block reasonably foreseeable intrusions by unauthorized third parties. We may store and process your personal information in the United States or Canada or any other country in which we or our agents maintain facilities.

THIRD-PARTY WEBSITES. This Privacy Policy applies solely to information collected by Company. This Privacy Policy does not apply to other websites that are accessible through this Site, including but not limited to any third-party websites.

DATA RETENTION. To provide you with the products and services you request, answer questions you may have about the products and services provided, and for our own accountability to external regulatory bodies, we retain your information for a period deemed reasonable under the circumstances. Information stored is removed, destroyed, or deleted periodically when it appears we will no longer have a need to contact you. Retention periods may be extended if we are required to preserve your personal data in connection with litigation, investigations and proceedings, or if a longer retention period is required or permitted by applicable law.

ACCESSING, REVIEWING AND CHANGING YOUR PERSONAL INFORMATION. You can see, review and change most of your personal information by logging into your account on the Site (if any) or by contacting us at the addresses below. If your personal information changes or is inaccurate, you must change it promptly.

There may be circumstances where your personal information is not accessible, reviewable or able to be modified by you through your account. With some exceptions, you have the right to see what personal information we hold about you. We can help you identify what records we might have about you and we will also try to help you understand any information you do not understand. We may need to confirm your identity before providing you with this access. We may require that your request to us for access be made in writing.

HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION: We strive to provide you with choices regarding the personal information you provide. We have created mechanisms to provide you with the following control over your information.

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note some parts of the Site may then be inaccessible or not function properly.

California residents may have additional personal information rights and choices. Please see Your California Privacy Rights Notice (Below) for more information.

RIGHTS OF INDIVIDUALS. Site users who wish to correct, update, change, or erase the information they submit on the Site should be able to go back to the applicable web form or their account to edit their user or organization record. For additional information or problems accessing your information from such page, please contact Company using one of the methods listed below.

If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country.

California residents may have additional personal information rights and choices. Please see Your California Privacy Rights Notice (Below) for more information.

DATA SECURITY. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where we have given (or you have created) a password for access to certain parts of our Site, you are responsible for keeping the password confidential. We ask that you not share the password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk, and we are not responsible for any circumvention of any privacy settings or security measures contained on the Site.

CONTACTING US. If you have questions regarding this Privacy Policy or the use of information collected, please contact us at:

Address: NRP Group, LLC
ATTN Information Technology Department
1228 Euclid Ave, 4th Floor
Cleveland, OH 44115
Email: privacy@nrpgroup.com
Phone: (833) 533-0410

Last Updated: 6/26/2020

YOUR CALIFORNIA PRIVACY RIGHTS NOTICE

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. This section specifically applies to California residents. This Notice for California Residents supplements the information contained in the general Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("CA Consumers"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Notice.

INFORMATION WE COLLECT. The site collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a consumer, household, or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from CCPA's scope protected by other sector-specific federal or California statutes.

Our Site has collected the following categories of personal information in the last twelve (12) months.

| Category | Examples | Collected |
|-----------------|---|------------------|
| A. Identifiers. | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's | Yes |

| | | |
|---|--|-----|
| | license number, passport number, or other similar identifiers. | |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | <p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p> | Yes |
| C. Protected classification characteristics under California or federal law. | Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information). | Yes |
| D. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | Yes |
| E. Biometric information. | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or | Yes |

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|---|--|-----|
| | identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | |
| F. Internet or other similar network activity. | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | Yes |
| G. Geolocation data. | Physical location or movements. | Yes |
| H. Sensory data | Audio, electronic, visual, thermal, olfactory, or similar information. | No |
| I. Professional or employment-related information. | Current or past job history or performance evaluations. | Yes |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. | No |
| K. Inferences drawn from other personal information. | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes | No |

CATEGORIES OF SOURCES FROM WHICH COMPANY HAS COLLECTED PERSONAL INFORMATION. We have collected the personal information directly from you (for example, the forms you complete or products and services you use) or indirectly from you (for example, from observing your actions on the Website). We also collect personal information from third party sources.

BUSINESS PURPOSE FOR WHICH TARGET HAS COLLECTED OR DISCLOSED PERSONAL INFORMATION. We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate your concerns and monitor and improve our responses.
- To personalize your Site experience and deliver content, product, and service offerings.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

We will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without providing you notice.

SHARING PERSONAL INFORMATION. We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We share your personal information with the following categories of service providers:

Disclosures of Personal Information for a Business Purpose. In the preceding twelve (12) months, Company has disclosed personal information to our affiliates, service providers, and third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you. Our service providers include Karen Graham Consulting, syndicators, Corelogic, ICIMS, Google, Yardi, Ultipro, Real Page, Apartment List, Inc., Freshworks, E-Premium Insurance, Brunswick Companies, Abodea, Hunter Warfield, National Credit System, Till, Blue Moon Software, Conservice, SEB, and Apartment List Inc.

Sales of Personal Information. In the preceding twelve (12) months, Company has not sold personal information and will not sell personal information in the future.

CATEGORIES OF PERSONAL INFORMATION DISCLOSED FOR A BUSINESS PURPOSE. In the preceding (12) months, Company has disclosed for a business purpose from the following categories described in the chart above:

- Identifiers
- Personal information categories listed in the California Consumer Records statute (Cal. Civ. Code § 1798.80(e)).
- Protected classification characteristics under California or federal law.
- Commercial Information.
- Internet or other network activity.
- Professional or employment related information.

YOUR RIGHTS AND CHOICES. The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights. We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.

You, or an authorized agent, have the right to request 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 or selling 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).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures of a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights. You, or an authorized agent, have the right to request 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 service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) 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 activities, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing 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.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

EXERCISING ACCESS, DATA PORTABILITY, AND DELETION RIGHTS. To exercise the access, data portability, and deletion rights described above please submit a verifiable consumer request to us by either:

Calling us at (833) 533-0410

Emailing us at privacy@nrpgroup.com

Visiting www.nrpgroup.com

Accessing your account and modifying your settings.

Only you, or someone legally authorized 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 a minor child.

If the verifiable request for access, data portability, or deletion is made through an authorized agent, we may require that the agent provide:

- Written permission from consumer.
- Verify the agent's identify with the business.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information. Sufficient information may include name, Driver's License number, Social Security number, address, date of birth, or other identifying information.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

You may make a verifiable consumer request for deletion through a two-step process. The verifiable consumer request must:

- Clearly submit a request to delete
- Separately confirm personal information should be deleted.
- Provide sufficient information to allow us to reasonably verify you are the person about whom we collected the personal information.

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.

RESPONSE TIMING AND FORMAT. Once we receive a verifiable consumer request, we will send an acknowledgement letter within 10 days which will describe the verification process. We endeavor to respond to a verifiable consumer request within forty-five (45) days of receipt. If we require more time, up to a total of 90 days, we will inform you of the reason and extension period in writing.

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 usable 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 the request warrants a fee, we will tell you why we made the decision and provide you with a cost estimate before completing your request.

Please note we are unable to disclose or provide you with your Social Security Number, Driver's License Number, or other government issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers.

NON-DISCRIMINATION. We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

OTHER CALIFORNIA PRIVACY RIGHTS. California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Site that are California residents to request certain information regarding our disclosure of personal

information to third parties for direct marketing purposes. To make such a request, please send an email to privacy@nrpgroup.com or write us at NRP Group, LLC, ATTN Information Technology Department, 1228 Euclid Ave, 4th Floor, Cleveland OH 44115.

CHANGES TO OUR PRIVACY NOTICE. We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Site and update the notice's effective date. Your continued use of our Site following the posting of changes constitute your acceptance of such changes.

CONTACT INFORMATION. If you have any questions or comments about this notice, the ways in which we collect or use the information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us.

Phone: (833) 533-0410

Website: www.nrpgroup.com

Email: privacy@nrpgroup.com

Postal Address: NRP Group, LLC

ATTN Information Technology Department

1228 Euclid Ave, 4th Floor

Cleveland, OH 44115