



PrimusIVS™ PRIVACY POLICY

Effective Date: April 29, 2021

Updated on: June 12, 2023

This Privacy Policy ("**Privacy Policy**") explains how Primus Institute for Valuation Studies LLC (now referred for convenience in this Privacy Policy as "**Primus IVS**", "**we**" "**us**" or "**our**") uses personal information (individually and collectively, in whole and in part now referred to for convenience in this Privacy Policy as "**Personal Information**" or "**PI**"), including yours. ("Personal Information" is defined in **Section 1** below). This Privacy Policy is intended to comply with the California Consumer Privacy Act and the California Privacy Rights Act (the "**CCPA/CPRA**"), and applies to all individuals including but not limited to, those who reside in the State of California on or after the Effective Date above, who visit our website and/or app at www.primusivs.com (individually and collectively now referred to for convenience in this Privacy Policy as the "**Site**"), subscribe to our services, send us emails, or purchase or access anything on or through the Site including but not limited to, the book "Valuing Fractional Interests in Real Estate 2.0" (all of the foregoing goods and services are now individually and collectively referred to for convenience in this Privacy Policy as "**Goods**," and those individuals, including you, who visit the Site are now sometimes individually and collectively referred to for convenience in this Privacy Policy as "**User(s)**", "**you**", or "**your**").

PLEASE READ THIS PRIVACY POLICY CAREFULLY, AS YOU MUST AGREE TO IT BEFORE BECOMING A MEMBER. YOU CAN ONLY ACCESS AND USE THE MEMBER-ONLY SECTIONS OF THE SITE BY CLICKING THE "I AGREE" CHECKBOX ON THE SIGNUP FORM. NOT DOING SO BARS YOU FROM ANY FURTHER ACCESS TO THE MEMBER-ONLY SECTIONS OF THE SITE. IF YOU DO NOT WISH TO BECOME A MEMBER, THE PORTION OF THIS POLICY THAT WILL STILL CONCERN YOU IS SECTION 11, COOKIES AND RELATED TECHNOLOGIES, BELOW.

Our General Contact Information. If you have any questions or comments about this Privacy Policy, the ways in which Primus IVS collects and uses your PI described in this Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: +1 (800) 290-2644

Fax: +1 (310) 734-1658

Website: www.primusivs.com

Email: support@primusivs.com

Postal Address: Primus IVS LLC

1901 Avenue of the Stars, Suite 200

Los Angeles, CA 90067 USA

Attn: Customer service/privacy

Our Privacy Policy is organized as follows:

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1. Categories and Specific Types of Personal Information

“**Personal Information**” is information we collect that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a particular User, household, or device. Please keep your PI accurate at all times.

Categories of PI

A. Identifiers (e.g., your real name, aliases, postal address, company, unique personal identifiers, online identifiers, internet protocol (IP) addresses, email addresses, social media addresses, account names, telephone numbers, social security number, drivers’ license and other government-issued identification numbers, passport number, and other similar identifiers).

B. Other information that identifies, relates to, describes, or is capable of being associated with you including but not limited to: your signature, physical characteristics or description, education, employment, employment history, onsite purchases, bank account numbers, credit card numbers, debit card numbers or any other financial information, medical information or health insurance information, areas of interest, areas of service, information collected from social media interactions, information about individuals who have referred Users to the Site or whom they have referred to the Site.

C. Characteristics of protected classifications under California or federal law (e.g., 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 but not limited to, familial genetic information).

D. Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming history or tendencies).

Specific Types of PI We Collect

Names, email addresses, company names, mailing addresses, phone numbers.

Credit and debit card numbers, User practice areas or specialties, the purposes for which Users intend to use the IVS members areas.

None in this Category.

Those Goods purchased or used through the Site.



E. Biometric information (e.g., genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data). None in this Category.

F. Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding your interaction with an Internet website, app, or advertisement) None in this Category.

G. Geolocation data (e.g., physical location or movements). None in this Category.

H. Sensory data (e.g., audio, electronic, visual, thermal, olfactory, or similar information). None in this category.

I. Professional or employment-related information (e.g., current or past job history or performance evaluations). None in this category.

J. Non-public personally identifiable education , information, as defined in the Family Educational Rights and Privacy Act (FERPA) (e.g., education records directly related to a student maintained by an educational institution or party acting on its behalf, including but not limited to, grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. None in this category.

K. Inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. None in this category.

L. Other Information when you visit or leave the Site (e.g., our plugins, cookies or similar technology on the sites or apps of others when you leave our Site. We usually receive the URL of both the site you came from and the one you go to next), your proxy server, operating system, web browser and add-ons, device identifier and features, ISP and/or your mobile carrier. If you use the Site from a mobile device, that device will likely send us data about your location based on your phone settings. In the unlikely event that we decide to use GPS or other location tools to identify your precise location, we'll ask you to Opt-In per **Section 6** of this Privacy Policy before we do. Cookies, as explained in our Cookie Policy (**Section 11**).

Personal Information does not include:

- Publicly available information from government records;
- Deidentified or aggregated User information; or,
- Information excluded from CCPA/CPRA's scope including but not limited to: HIPAA, clinical trial data, and the Fair Credit Reporting Act.



2. How Primus IVS Collects Personal Information

We collect PI when you visit the Site, contact us, purchase Goods on or through the Site, or otherwise interact with the Site. We may track the Goods you view or purchase, or other data. We use cookies and related technologies to collect information about the devices Users use to access and interact with the Site, and our business partners' sites including but not limited to, www.primuspvx.com. You can read more about cookies and other technologies in Cookies and Related Technologies, **Section 11** below.

The social media platforms, or other methods of communication Users use to interact with IVS or the Site, may have their own specific privacy statements or policies that govern the use of Personal Information related to that platform or app. You should find and **CAREFULLY READ** those privacy statements and policies, as **OUR PRIVACY POLICY DOES NOT APPLY TO THOSE PLATFORMS OR APPS**.

We may receive additional Personal Information from third parties. We may use this Personal Information to enhance other information we have about Users to help us better understand them, and to otherwise enhance the Site, and/or the Goods.

3. How Primus IVS Uses Personal Information

Primus IVS uses Personal Information for the following reasons:

- Auditing related to a current interaction with you;
- Responding to User questions and inquiries;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality;
- Short-term, transient use, provided the PI is not disclosed to a third party;
- Performing services on behalf of a business or service provider with whom we have a relationship including but not limited to, maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying your information, and processing payments;
- Undertaking internal research for technological development and demonstration; and,
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

(All of the above bullet points in this **Section 3** are each an example of a “business purpose,” which is defined in **Section 4** below).

- Operating and improving the Site;
- Facilitating and processing orders for Goods including but not limited to, their purchase and shipping;
- Tracking Users purchasing and/or use habits of Goods, and performing other analytics;
- Managing and developing our business and operations;
- Communicating and providing additional information that may be of interest to Users about Primus IVS and our merchants and business partners, such as newsletters, special offers, curated content, and announcements, but only that in which a User has elected to participate;
- Sending Users reminders, technical notices, updates, security alerts and support, administrative messages, service bulletins and marketing information;
- Sending Users other information we believe may be pertinent to their use of the Site, via email messages, text messages, apps, phone calls, and other methods of communication;
- Adding to our contact database; and,



- Managing our everyday business needs, such as Site administration, forum management, fulfillment, analytics, enforcement of our corporate reporting obligations, our Terms of Use, or to comply with the law.

4. With Whom Primus IVS Shares Your Personal Information

We routinely share Personal Information with:

- Service providers we use to help deliver our Goods to you, such as payment service providers, and delivery companies;
- Affiliated companies (such as our subsidiaries and other companies owned and/or controlled by or affiliated with Primus IVS); and,
- Other service providers we use to help us run our business, such as sites through which one can subscribe to our Goods, website hosts, and those third parties set out in **Section 3** above.

We may disclose, subject to your Opt-Out and Opt-In Rights discussed in **Section 6** below, your PI to a service provider or processor solely for a business purpose. A “**business purpose**” is defined as the use of PI for our or a service provider’s (“**SP**”) operational purposes, or other notified purposes, provided that the use of PI is reasonably necessary and proportionate to achieve the operational purpose for which the PI was collected or processed, or for another operational purpose that is compatible with the context in which the PI was collected. When we disclose PI for a business purpose, we, as the “controller,” enter into a contract with that processor that describes the purpose and requires the recipient to both keep that PI confidential, and not use it for any purpose except performing the contract. (The CCPA/CPRA prohibits service providers who receive the PI we hold from redisclosing it, unless you have received explicit notice and an opportunity to Opt-Out of further disclosure).

5. Disclosure of Personal Information to Third Parties

In the preceding twelve (12) months, we have not disclosed PI to a third party.

6. No sale of Personal Information

We do not and will not sell your PI.

7. When, Why, and To Whom Primus IVS Discloses Personal Information

We will not disclose your Personal Information to third parties except to:

- Affiliated companies (such as our subsidiaries and other companies owned and/or controlled by or affiliated with, Primus IVS) who may only use the Personal Information for the purposes described in **Section 3** above;
- Third party merchants, but only to the extent a User has participated in an activity sponsored or offered through Primus IVS on behalf of that merchant. We may also provide merchants with Personal Information to combat fraud and as part of legal proceedings affecting Primus IVS and that merchant;
- Primus IVS business partners as part of an offer or other activity that is provided by or in conjunction with Primus IVS and/or its business partners, and in which a User has elected to participate. For example, if a User is referred to Primus IVS from a business partner's website or through an invitation facilitated by or in conjunction with a Primus IVS business partner, we may provide that business partner certain PI to validate the referral, and to support the terms of the relationship between us and that business partner. This in turn may allow that business partner to contact you directly and/or to advertise to you;



- Effect or evaluate a merger, acquisition, or otherwise to support the sale or transfer of some or all of our business assets;
- To enforce our rights or protect our property;
- To protect the rights, property, or safety of others, investigate fraud, respond to a government request; or, as needed to support auditing, compliance, and corporate governance functions; and,
- To defend ourselves in litigation or a regulatory action and when required or advised to do so by law or our legal counsel in their representation of us. This includes but is not limited to, in response to a subpoena or similar legal proceedings, including to law enforcement agencies, regulators, and courts in the United States and other countries.

We encourage our third-party merchants and business partners to adopt and post their own privacy policies, since they are **NOT** covered or governed by ours. So, **THE USE OF YOUR PERSONAL INFORMATION BY THIRD PARTIES YOU CAN ACCESS THROUGH THE SITE, OR WHO PROVIDE GOODS OR INFORMATION ON OR THROUGH THE SITE, IS GOVERNED BY THEIR PRIVACY POLICIES, AND IS NOT SUBJECT TO OURS.**

You will be notified by email and we will post a prominent notice on the Site of any changes in ownership or uses of your Personal Information, as well as of any new or different choices you may have regarding your Personal Information.

We may also disclose information about Users that is not personally identifiable. For example, we may provide our merchants, business partners, or other third parties with reports that contain aggregated and statistical data about our Users.

8. Your Rights and Choices, Including Opt-in and Opt-Out Rights

The CCPA/CPRA provides California residents with specific rights regarding their Personal Information. This section describes your CCPA/CPRA rights and explains how to exercise those rights.

8.1 Accessing, Correcting and Deleting Personal Information. We think that you benefit from a more personalized experience when we know more about you and the kinds of Goods you like. However, you can limit the information you provide to Primus IVS and you can limit the communications that Primus IVS sends to you.

It is important that you keep your Personal Information current and accurate at all times by: logging into your account through our Site and selecting "[Personal Information](#)"; sending us an email at support@primusivs.com and including "Privacy" in the subject line, or by postal mail, phone, or fax at the address at the end of the next sentence. If you want to close your account, need help with accessing, updating and deleting your personal information, or have other questions or requests, please contact our customer service department at support@primusivs.com or by postal mail, phone or fax at:

Primus Institute for Valuation Studies LLC
1901 Avenue of the Stars, Suite 200
Los Angeles, CA 90067 USA
Phone: (800) 290-2644
Fax: (310) 734-1658

You can manage your email preferences by logging into your account through our Site, selecting "Personal Information," and then clicking "Subscribe" or "Unsubscribe" in the "Edit Email Permissions" section under "Display Info." You can also manage your subscriptions by following subscription management instructions contained in some of the messages that we send you. You can update your subscription preferences whenever you want. Please note that even if you unsubscribe from promotional email messages, we may still need to contact you with important transactional information related to your account, subscription and/or purchases. For example, even if



you have unsubscribed from our promotional email messages, we will still send you confirmations when you purchase Goods from us.

You may manage how your browser handles cookies and related technologies by referring to **Section 11** below.

While we're ready to assist you in managing your Personal Information or closing your account, we can't always delete records of past interactions and transactions. For example, we're required to retain records relating to previous purchases on the Sites for financial reporting and compliance reasons.

We will retain your information for as long as you have an account with us, to provide you Goods and other goods and services, to maintain a record of your transactions for financial reporting purposes and otherwise as we feel is necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

8.2 You have the right to request that we disclose to you information about our use and collection of your PI (a "**Right to Know**") over the past twelve (12) months. Once we receive and have verified the request, we will disclose this information to you within 45 days.

8.3 You have the right to request that we permanently delete, deidentify, or anonymously aggregate with the PI of others, all or parts of your PI (a "**Right to Delete**"). However, we can deny a Right to Delete request when the PI is needed to:

- Complete the transaction for which we collected the PI;
- Fulfill the terms of a written warranty or product recall conducted under applicable law;
- Provide goods or services you previously requested;
- Otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
- Debug and repair errors that impair Site functionality;
- Exercise a legal right, such as free speech rights;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest;
- Enable internal uses reasonably aligned with your expectations based on your relationship with us;
- Comply with a legal obligation; or,
- Otherwise use your PI internally in a lawful manner that is compatible with the context in which you provided the PI.

We will inform the requester that we received the request within ten (10) days of our receipt, and how we will process the request. If we deny all or part of a Right to Delete request, we will respond to the requester the reasons for any denials not prohibited by law.

We will maintain a record of all requests, and how they were responded to, for at least twenty-four (24) months. Please note that only two requests are allowed in any twelve (12) month period. However, the categories of sources and purposes need not be specified for each category of PI identified.

Identifying and Verifying the Requester

To identify and verify the requester, we associate the information provided in the verifiable request to any of your PI previously collected by us. "**Verify**" means determination by us that the requester making a Right to Know request, Right to Delete request, Right to Opt-Out request, or Right to Opt-In request, is about your PI, is you, or someone properly authorized by you, or is your parent or legal guardian if you are under 13 years of age.



We verify requests associating the information provided to us in the request to any of your PI we previously collected. We can't require that you notarize a request, but we can ask for the request to be a signed declaration under penalty of perjury, request the requester to identify goods or services you recently purchased, or the dollar amounts of those recent purchases.

How to Make Requests

Only you, or someone legally authorized to act on your behalf, may make a verifiable request related to your PI. The request must provide sufficient information that allows us to properly understand, evaluate, and respond to it, as well as reasonably verify you are the person about whom we collected PI or an authorized representative of that person. Your request should at a minimum include the following:

- Your account number, the approximate date you opened your account, and your password for the Site;
- When you last purchased something on the Site, and the dollar amount of that purchase;
- The type of request you are making; and,
- The specific PI to which your request pertains.

You may also make a verifiable request on behalf of your minor child, although the Site is not intended for use by anyone under the age of 18 years of age.

You can also designate an **authorized agent** to make a request for you. To designate an authorized agent, you must provide your:

- account number, date approximate you opened your account, and your password for the Site.
- a copy of your email or other correspondence to your agent, verifying you want that person to act as your agent in this regard, from the email address of yours which you have on file with us, with the agent's contact information in it, so we can verify your request.

Requests to us can be made by either:

- Calling us at +1 (800) 290-2644;
- Emailing us at support@Primusivs.com and placing "PI Request" in the subject line; or
- Visiting our Site page to make a request, at www.primusivs.com/contact-us.

If new PI of yours is obtained by us so we can verify the request, we will only use it for that verification and then delete it, unless the requester consents otherwise.

We cannot respond to your request or provide you with PI if we cannot verify your identity or authority to make the request, and confirm that the PI relates to you, within forty-five (45) days of our receipt of your request.

Request Response Timing and Format

We endeavor to respond to verifiable requests (e.g., to disclose, delete, effectuate Opt-In or Opt-out) within 45 days of our receipt of it. If we require more time, which can be up to an additional 45 days, we will within the initial 45 days inform the requester of the reason for and length of the extension period in writing.

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



Any disclosures we provide are required to cover only the twelve (12) month period preceding our receipt of the verifiable request, but we will make a reasonable effort to comply with a request beyond that date, if it is possible. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For all requests, we will select a format to provide your PI that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance including but not limited to, an email that can be forwarded.

Other Request Matters

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

Please note that we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, however, most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

You can also manage the sharing of certain of your Personal Information with us when you connect with us through a social media platform or app, such as through Instagram, Twitter, Facebook, or LinkedIn. Please refer to the privacy policies and settings of the social media platform or app to determine how you may adjust our permissions and manage the interactivity between Primus IVS and that social media account.

If you wish to Opt-Out of receiving offers directly from Primus IVS’s merchants or business partners, you can follow the Opt-Out instructions in the emails that they send you.

8.4. We do not knowingly acquire the PI of Users we actually know are under 18 years of age.

8.5. We do not sell your Personal Information.

9. Non-Discrimination

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

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

10. CCPA/CPRA Compliance Training

We will inform our employees and any others responsible for handling User inquiries about our privacy practices and our compliance with the CCPA/CPRA, of all requirements set out in the CCPA/CPRA, how to effectuate those requirements, and how to direct Users to exercise their rights under the CCPA/CPRA.



11. Cookies and Related Technologies

When Users use the Site, we collect certain information by automated or electronic means, using technologies such as cookies, pixel tags, clear gifs (also known as web beacons and web bugs), browser analysis tools, and web server logs. A **“clear gif”** is a nearly invisible, pixel-size graphic image on an app, website page, app or website-based document, or email. It helps us do things like view the URL of the page in which the clear gif appears, and the time our Site and the email in question is viewed. In emails, clear gifs help us confirm the receipt of and respond to our emails including but not limited to, those that Users forward to friends and family, as well as to help us deliver a more personalized online experience.

As a User uses the Site, their browser and other devices, like certain types of phones and tablets, communicate with servers operated by us, our business partners and service providers, to coordinate and record the interactivity and fill their requests for Goods and information.

The information from cookies and related technology is stored in web server logs and also in web cookies kept on the computers or other devices from which Users access the Site. This information is then transmitted back to the Site by these devices. These servers are operated, and the cookies managed, by us, our business partners, or our service providers.

For example, when a User visits the Site, Primus IVS and/or our service providers may place cookies on that computer or device. Cookies allow us to recognize the User when they return and to track and target your interests in order to provide a customized experience. They also help us to detect certain kinds of fraud.

A **“cookie”** is a small amount of information that a web server sends to your browser. It stores information about your account, your preferences, and your use of the Site. Some cookies contain serial numbers that allow us to connect your Site activity with other information we store about you or as related to your interactions with the Site.

Some cookies are temporary, whereas others may be configured to last longer. **“Session” cookies** are temporary cookies used for various reasons including but not limited to, managing page views. Browsers usually erase session cookies once the browser is exited. **“Persistent” cookies** are more permanent cookies that are stored on the computers or other devices people use even beyond when they exit their browser. We use persistent cookies for a number of purposes. These include but aren't limited to, retrieving certain information a User has previously provided (like their password, if they asked to be remembered), and storing that User's preferences, such as the types of Goods in which they've told us they're interested.

“Pixel tags” are tiny graphic images placed on website pages or in our emails that allow us to determine whether a User has performed certain specific actions. When that User accesses these pages or opens our email messages, the pixel tags generate a notice of that action to us and/or our service providers. These tools allow us to measure response to our communications and improve our web pages and promotions.

We collect many different types of information from the devices a User uses to access the Site, using these cookies and other technologies. Some examples of this information are the User's operating system type, browser type, domain and other system settings, the language the User's system uses, and the country and time zone of that device. Browsers routinely send these types of information to web servers. Our server logs also record the Internet Protocol (**“IP”**) addresses of the devices a User uses to interact with the Site. An **“IP address”** is a unique identifier that devices use to identify and communicate with each other online. We may also collect information about the website or app a User was visiting before they came to the Site, and the app or website they visit after they leave the Site, if this information is supplied to us by the User's browser.

In many cases, the information we collect using cookies and other technologies is used in non-identifiable ways, without any reference to Personal Information. For example, we use information we collect about Users to



optimize the Site and understand its traffic and usage patterns. Another example is we associate the information we collect using cookies and related technologies with Personal Information. In that case, this Privacy Policy governs how we use that information.

One of Primus IVS's service providers is Google Analytics. They provide certain analytics and optimization services for the Site. If you'd like more information on how to remove yourself from the tracking and reporting functions performed for or by the Site by Google Analytics, please contact us at support@primusivs.com and include "Google Analytics Opt-Out" in the subject line.

Users can also **RID THEIR DEVICES OF COOKIES** by blocking or deleting them. This is often done by adjusting their browser's privacy and security settings. How to do this depends on the type of browser being used. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. You might also find information about this by clicking your browser's "Help" tab, or by contacting them. One can also try typing something like "deleting cookies" and your browser type into an internet search engine.

12. Security of Personal Information

Primus IVS has implemented an information security program that contains administrative, technical, and physical controls designed to reasonably safeguard Personal Information. For example, we use industry-standard encryption technology to secure PI when it is being transmitted over the Internet. We also comply with industry standards for password encryption, security certification, periodic vulnerability testing, and periodic service, database, and server security scanning and vulnerability patching. When our employees need to access your PI in the course of providing Goods to you, we track it internally. When our service providers, like our credit card processing provider, need to access your PI in the course of providing our Goods, they do so according to PCI (Payment Card Industry) data security standards. However, despite our security program and procedures, you acknowledge and understand that **WE CAN'T GUARANTEE** that any person or company will be prevented from obtaining your PI, or any other information including but not limited to, through unauthorized means such as cyberattacks or hacking.

13. Privacy Practices of Third Parties

This Privacy Policy **ONLY** addresses the use and disclosure of information by us through your interaction directly with the Site. Other website and apps that may be accessible through links from the Site may have their own privacy statements and information collection, use, protection, and/or disclosure practices. **WE ARE NOT RESPONSIBLE** and do not monitor the internet or other practices of any third parties. Our affiliates, business partners, merchants or service providers may have their own privacy policies too. We encourage you to **READ CAREFULLY** and be familiar with the privacy policies provided by these other parties prior to providing them with any information or taking advantage of any of their offers or promotions. **PRIMUS IVS IS NOT RESPONSIBLE** for the privacy or security of any information you provide to these third parties.

14. Communities

The Site may contain or be linked to online or other communities, social media platforms, and other areas where you may be able to publicly post and otherwise share information, interact, network, make comments and communicate with others, such as but not limited to, Instagram, LinkedIn, Twitter, Facebook, discussion boards, chat rooms, and blogs, where you can among other things market your services, submit and view media content, and seek advice (individually and collectively "**Communities**"). Prior to posting in any of these areas, please read our [Terms of Use](#) carefully. All the information you post will be accessible to anyone with Internet and/or mobile access, and any Personal Information you include in your posting may be read, collected, and used by others. **YOU SHOULD ALWAYS BE VERY CAREFUL ABOUT PUBLICLY POSTING YOUR PERSONAL INFORMATION. YOU SHOULD**



ALSO REFER TO THE PRIVACY POLICIES OF EACH SOCIAL MEDIA PLATFORM YOU USE AND ON WHICH YOU HAVE AN ACCOUNT OR CHANNEL, TO SEE HOW THEY DEAL WITH PERSONAL AND OTHER INFORMATION. PLEASE REMEMBER THAT PRIMUS IVS IS NOT RESPONSIBLE FOR THE PRIVACY OR SECURITY OF ANY INFORMATION YOU PROVIDE TO THESE THIRD PARTIES.

If you have questions about Personal Information posted in our Communities, please contact support@primusivs.com and include “Communities” in the subject line.

15. Changes to this Privacy Policy

From time to time, we may update this Privacy Policy at our discretion to clarify our practices, or to reflect new or different privacy practices, such as when we add new features to the Site or other sites or apps, or to comply with current laws and regulations. If we make any changes, we will post a “Updated on” date under the Effective Date” at the top left of this Privacy Policy. We will notify you by email (sent to the email address you have provided us), and post a notice on the Site’s home page, both of which will contain a link to the updated Privacy Policy so you can read it. We also encourage you to periodically review this Privacy Policy for the latest information about our privacy practices.

Your continued use of the Site after we publish and/or send a notice about our changes to this Privacy Policy constitutes your acceptance of the updated Privacy Policy.

16. Important Information for Non-U.S. Residents

Data Transfers

Primus Institute for Valuation Services LLC is headquartered in the United States. This Privacy Policy originates and is hosted on a website located in the United States. If you are located in the EEA or other regions, they may have laws governing data collection and use that may differ from the laws in the United States, and/or may not provide equivalent levels of data protection as your home jurisdiction. Additionally, your information may be processed by staff operating outside the EEA who work for us or for one of our service providers. This may happen if our servers or suppliers and service providers are based outside the EEA, or if you use access, avail yourself and/or purchase Goods while visiting countries outside this area. We will take steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it. We provide adequate protection for the transfer of Personal Information to countries outside of the EEA or Switzerland through a series of intercompany agreements based on the Standard Contractual Clauses.

If you are a resident of a country other than the United States, continued use of the site means you acknowledge and consent to our collecting, transmitting, and storing your Personal Information out of the country in which you reside.

General Data Protection Regulation (GDPR)

The following provisions apply to you if you are a European citizen or resident. All processing of your Personal Information used to be performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the “**Directive**”), and the implementations of the Directive in local legislation. As of May 25, 2018, the Directive and local legislation based on the Directive was replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personally Identifiable Information (PII) and on the free movement of such data, known as the General Data Protection Regulation (“**GDPR**”), and our applicable processing will take place in accordance with the GDPR. For purposes of the GDPR, we will be the “data controller” of PII (referred to in the GDPR as “personal data”) we collect through the Site, unless we collect such information on behalf of a data controller, in which case we will be a “data processor.” This



Privacy Policy does not apply to websites, applications or services that do not display or link to this Privacy Policy, or that display or link to a different privacy policy.

This Privacy Policy has been compiled to better serve those who are concerned with how their PII is being used online. PII, as described in U.S. privacy law, Directive 95/94C (“**The EU Directive**”) and its replacement/ the GDPR, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Should designation of a data privacy officer be required of us, our person is:

Dennis A. Webb
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Los Angeles, CA 90067 USA
Email: support@primusivs.com

END OF PRIVACY POLICY