

Wheelock Privacy Policy

Effective date: March 11, 2022

This Privacy Policy describes how Wheelock Street Capital L.L.C. and its affiliates collect and process personal information in connection with the operation of the Wheelock investor portal and Wheelock websites that link to this privacy policy (collectively the “Services”). We also provide a supplementary [privacy notice for California residents](#).

About Wheelock

Wheelock is a vertically integrated private real estate investment firm, with an enhanced strategy that marries deep asset-level expertise with market knowledge. Wheelock’s in-house asset level expertise in hospitality, residential land, multifamily, industrial, office, and retail effectively provide an existing foundation for direct opportunistic and long-term value investing.

Personal Information We Collect

Information you provide us. Personal information you provide to us through the Services includes:

- **Account and contact information**, such as your first and last name, email address, other contact details and password.
- **Usage information**, including information about how you use the Services, such as the types of content you engage with, content you share, features you use, actions you take, and people or accounts you interact and connect with.
- **Communications** that we exchange with users when they contact us with questions or feedback, including feedback about interacting with other users, and questions about purchasing.
- **Other information** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Automatic data collection. We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with the Services, our communications, and other online services, such as:

- **Device data**, such as device IP address (and derived location), device name and operating system, browser type and settings, telecommunications provider, operating system, the date and time of Services use, and interactions with the Services.
- **Online activity data**, such as information about your use of and actions on the Services, including pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, frequency, and length of access. This information may be collected on our Services using cookies, browser web storage (also known as locally stored objects, or “LSOs”), web beacons, third-party software development kits (“SDKs”) and similar technologies described below.

Cookies and similar technologies. Our Services may use the following technologies:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

How We Use Personal Information

We use personal information for the following purposes or as otherwise described at the time of collection:

Services delivery, including to:

- Operate the Services and our business;
- Maintain and improve the Services and the Services' features;
- Create and maintain your account;
- Communicate with you about the Services, including by sending announcements, updates, security alerts, and support and administrative messages; and
- Provide support for the Services, and respond to your requests, questions, and feedback.

Research and development. We may create and use de-identified information for our business purposes, including to analyze the effectiveness of our Services, to improve and add features to our Services, and to analyze the general behavior and characteristics of users of our Services. We may use this anonymous, aggregated, or de-identified data and share it with third parties for our lawful business purposes.

Support and maintenance. We use third party analytics services to automatically log certain information about your device and how you interact with the Services. The information collected is used to troubleshoot and prevent errors, perform data analysis, and develop new features.

Compliance and protection. We may use personal information to:

- Protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims);
- Enforce the [Terms of Service](#) that govern the Services;
- Audit our internal processes for compliance with legal and contractual requirements and internal policies;
- Prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft; and

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

Direct marketing. We may send you marketing communications via email as permitted by law. You will have the ability to opt-out of our marketing and promotional communications as described in the [Opt out of marketing communications](#) section.

How We Share Personal Information

We may share personal information with:

Service providers. Companies and individuals that provide services on our behalf or help us operate the Services or our business (such as hosting, analytics, customer support, email and SMS delivery, payment services, and identity verification services).

Professional advisors. Professional advisors, such as lawyers, auditors, bankers, and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties as we believe necessary to: (a) protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Services; and (c) protect, investigate, and deter against fraudulent, harmful, unauthorized, unethical, or illegal activity.

Business transferees. Acquirers and other relevant participants in business transactions (or negotiations for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale, or other disposition of all or any portion of the business or assets of, or equity interests in, Wheelock or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Your Choices

Opt out of marketing communications. You may opt out of marketing-related communications by following the opt out or unsubscribe instructions contained in the marketing communication we send you.

Online tracking opt out. There are a number of ways to limit online tracking, which we have summarized below:

- **Blocking cookies in your browser.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.
- **Using privacy plug-ins or browsers.** You can block our websites from setting cookies by using a browser with privacy features, like [Brave](#), or installing browser plugins like [Privacy Badger](#), [Ghostery](#), or [uBlock Origin](#), and configuring them to block third party cookies/trackers.
- **Google analytics.** We use Google Analytics to help us better understand how people engage with the Services by collecting information and creating reports about how users use our Services. For more information on Google Analytics, click [here](#). For more information about Google's privacy practices, click [here](#). You can opt out of Google Analytics by downloading and installing the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout>.

Note that because these opt out mechanisms are specific to the device or browser on which they are exercised, you will need to opt out on every browser and device that you use.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Other Sites and Apps

The Services may contain links to websites and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites or online services operated by third parties, and we are not responsible for their actions.

Processing of Personal Information in the U.S.

We are headquartered in the United States with affiliates and services providers that operate in other countries. Your personal information may therefore be processed in the United States or transferred to other locations.

Security

We employ a number of technical, organizational, and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.

Children

The Services are not intended for use by children under 13 years of age. If we learn that we have collected personal information through the Services from a child under 13 without the consent of the child’s parent or guardian as required by law, we will delete it.

Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the website.

How to Contact Us

You can reach us by email at investors@wheelockst.com or at the following address:

Wheelock Street Capital L.L.C.
660 Steamboat Road, 3rd Floor
Greenwich, CT 06830

Notice to California Residents

We are providing this supplemental privacy notice to consumers in California, pursuant to the California Consumer Privacy Act of 2018 (“CCPA”). Please note, we do not sell personal personal information.

The CCPA grants California residents the following rights:

- **Information.** Our Privacy Policy describes how we use and share your personal information through the Services, including during the past 12 months. The Policy describes:
 - The sources through which we collect California residents' personal information and the types of personal information collected in the [Personal Information We Collect](#) section.
 - The purposes for which we use and share this information in the [How We Use Personal Information](#) section and the [How We Share Personal Information](#) section.
 - How users share information via Wheelock in the [How You Share Information on Wheelock](#) section of the Privacy Policy.
- **Access.** You can request a copy of the personal information that we maintain about you.
- **Deletion.** You can ask to delete the personal information that we maintain about you.

The CCPA limits these rights. For example, companies may not provide users in response to access requests certain sensitive information and other consumers' personal information, and may exclude information that would compromise the confidentiality of trade secrets. The CCPA also places limits on when companies must comply with a deletion request.

You are entitled to exercise the rights described above free from discrimination.

Here is how you can submit requests:

- **To request access to or deletion of personal information collected,** please email us at investors@wheelockst.com or call 203-413-7700.
- **To verify your identity prior to responding to your requests,** we may ask you to confirm information that we have on file about you or your interactions with us. Where we ask for additional personal information to verify your identity, we will only use it to verify your identity or your authority to make the request on behalf of another consumer.
- **Authorized agents.** California residents can empower an "authorized agent" to submit requests on their behalf. We will require authorized agents to confirm their identity and authority, in accordance with the CCPA.