

Privacy Policy for Christopher Alan Homes

TABLE OF CONTENTS

- 1. Introduction
- 2. Notice at Collection for California Residents
- 3. Personal Information Collected, Used, And Disclosed Within the Past 12 Months
- 4. Information Collected Through Technology
- 5. California Privacy Rights
- 6. Other State Privacy Rights
- 7. How to Submit Privacy Right Requests
- 8. International Users
- 9. Security Measures Taken to Protect Personal Information
- 10. Information Sharing
- 11. Children's Privacy
- 12. Miscellaneous
- 13. Shine the Light Law
- 14. Notice of Financial Incentive
- 15. Questions or Comments
- 16. Effective Date

INTRODUCTION

<u>CAH's Privacy Commitment.</u> All companies need to share their customers' personal information to run their everyday business. "Personal information" refers to information that identifies (whether directly or indirectly) a particular individual, household, or device, such as information you, or someone on your behalf, provide on our contracts, forms, surveys, applications, or online fields. The types of Personal Information we collect depends on the community you are looking at or live in, how you interact with us (e.g., whether you visit our Sites), or the services you request.

In this Privacy Policy ("Policy"), we explain (a) how JHS Builders, LLC and its affiliates, including Christopher Alan Homes, Christopher Alan Realty, and those with CAH in their name, such as CAH Title, LLC (collectively referred to as "CAH," also "we," "us," or "our") share our customers' Personal Information, (b) the types of companies with which we share customers' Personal Information, and (c) whether and how customers can limit this sharing.

CAH respects the privacy of our customers. Protection of your Personal Information is important to us. Please read this Policy carefully to understand what we do.



This Policy describes how we collect, use, share, and protect the Personal Information that CAH collects generally and through the websites located at christopheralanhomes.com and cah-title.com (the "Sites"). By visiting the Sites, you are acknowledging that you have read, accept, and agree to the terms of this Policy.

NOTICE AT COLLECTION FOR CALIFORNIA RESIDENTS

In addition to this Privacy Policy, we are providing this state-specific notice to California residents pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (collectively, "CCPA").

We collect and use, and have collected and used, during your relationship with us, including the last twelve (12) months, if applicable, the following categories of Personal Information: (i) identifiers, such as your name, email address, phone number, device identifiers, and online identifier; (ii) geolocation data, such as the location of your device or computer; (iii) professional or employment-related information; (iv) information regarding your interaction with the company websites or Apps, including the date, time, and duration of use; and (v) information that may reveal gender, age, or other characteristics of protected classifications under California or federal law.

We collect and use your Personal Information for the following purposes: (i) to operate, provide, troubleshoot, and improve our products and services; (ii) to create your profile and store information in our database software (iii) to personalize the content, messages, and web or App experience we provide to you; (iv) to allow you to log-in on multiple devices and use your single sign-on capabilities; (v) to deliver notifications, alerts, and other communications to you; (vi) to fulfill contractual obligations with our trade partners or vendors; (vii) to protect your, our, or others' rights, property, or safety; (viii) to maintain the security and integrity of the website or App; (ix) to detect, prevent, and respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of the website or App; (x) to comply with law enforcement requests and legal or regulatory requirements; and (xi) to support our business operations.

In some cases, we also collect and use Personal Information that qualifies as "Sensitive Personal Information" under the CCPA. Sensitive Personal Information is a subset of Personal Information. We may collect the following categories of Sensitive Personal Information: (i) state identification numbers; (ii) precise geolocation. We may collect and use Sensitive Personal Information: (i) to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services; (ii) to prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information; (iii) to resist malicious, deceptive, fraudulent, or illegal actions directed at CAH; and (iv) for short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with CAH.

Please note that these are categories of Personal Information as they are set forth under California law. We did not necessarily collect all of the specific pieces of Personal Information listed for any given person.



Although we do not sell your Personal Information, some of our practices within the last 12 months could fall within California's definition of "sharing." We or our partners (e.g., Google) may collect identifiers such as your Internet Protocol address, or other online identifier, as well as your Internet or other electronic network activity (including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet website, application, or advertisement) to deliver the most relevant advertisements to you. Where we collect this information, we may disclose it to our digital marketing partners for this purpose. By using the CAH website and web app, you agree to allow CAH to share information with its partners.

We will not retain your Personal Information for longer than reasonably necessary for the purpose(s) we collected it. How long we retain your Personal Information depends on a number of criteria, including the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements. Once we no longer have a need for your Personal Information, we will securely destroy it in accordance with our standards and applicable laws and regulations.

CAH does not sell or share the Personal Information of individuals under 16 years of age, and we do not use or disclose your sensitive Personal Information for any purposes other than those permitted by the CCPA (e.g., as necessary to provide goods or services you've requested, legal compliance, etc.).

For more information about your California Privacy Rights, please see below.

PERSONAL INFORMATION COLLECTED, USED, AND DISCLOSED WITHIN THE PAST 12 MONTHS

Below you will find a chart that generally describes the categories of Personal Information we have collected, where that information came from, the purpose for the collection of that information, the categories of parties to whom that information was disclosed, and the purpose for that disclosure, all within the past 12 months from the effective date of this notice and as it relates to consumers (e.g., prospective or actual home buyers; real estate, insurance, and loan professionals).

What Personal Information Do We Collect?	Where Do We Get It?	Why Do We Collect It?	To Whom Do We Disclose It?	Why Do We Disclose It?	Have We Shared It Within The Last Twelve (12) Months? Why and With Whom?	
Identifiers such as a real name, postal address, online identifier,	YouMarketing partners	• To provide our services (e.g., execute contracts,	 Service providers and/or contractors 	 Providing our services (e.g., effectuating 	 Yes. We share such information with service providers, 	



Internet Protocol address, email address, account name, or other similar identifiers.	 (e.g., lead sellers) Service providers or contractors (e.g., survey or analytics providers) Web technologi es 	underwrite your title insurance policy) Data analytics Marketing Loss prevention Legal compliance and accounting requirements	 (e.g., IT, customer service, transaction processors) Trades vendors Design studios Financial institutions Homeowners' associations Government entities Dispute resolution bodies Homebuyers (if you, as a loan officer, sign up to list your professional information on the Mortgage Choice Customer Portal) 	 a sale, managing our construction projects) Confirming your identity Marketing/a dvertising Dispute resolution and legal compliance purposes As directed by you (e.g., facilitating homebuyer- loan officer relationship s) 	marketing consultants, master-planned community managers, and third-party vendors to fulfill warranty requests, answer your questions, run and manage our business, protect our interests, and support internal marketing efforts.
Categories of personal information described in <u>subdivision (e) of</u> <u>Section 1798.80</u> .	 You Insurance companies Mortgage providers Service providers or contractors (e.g., survey or analytics providers) Marketing partners Web technologi es 	 To provide our services (e.g., process transactions, help you obtain insurance or a mortgage) Data analytics Marketing Fraud/abuse prevention Legal compliance and accounting requirements 	 Service providers and contractors (e.g., advertising, transaction processors, IT) Trades vendors Financial institutions Accounting consultants 	 Providing our services (e.g., effectuating a sale, managing our construction projects) Confirming your identity Resolving disputes Marketing/a dvertising Accounting Legal compliance purposes As directed by you (e.g., 	 Yes. We share such information with service providers, marketing consultants, and third-party vendors to fulfill warranty requests, answer your questions, run and manage our business, protect our interests, and support our marketing efforts.



Characteristics of protected classifications under California or federal law (e.g., age, marital status, ethnicity, race, religion, or health condition).	 You Our customer service, marketing, or analytics partners 	 To provide our services Determine your eligibility for an age- restricted community Data analytics Marketing 	 Trades vendors IT service providers 	 facilitating homebuyer- loan officer relationship s) Providing our services and responding to customer needs Verifying your identity Legal compliance purposes Determining eligibility for certain housing programs 	• No.
Commercial information, including records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.	 You Insurance companies Settlement providers Lenders 	 To provide our services Data analytics Marketing Fraud/abuse prevention Legal compliance and accounting Risk management 	 Service providers and/or contractors (e.g., marketing, risk management partners) Homeowners' associations Government entities Professionals involved in a home purchase Financial institutions (at the consumer's direction) Visitors to our Sites, if the consumer submits a photo for posting on our Sites 	 Providing our services Risk managemen t Marketing Dispute resolution Legal compliance 	• No.



Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, or advertisement.	•	Social media and other internet postings Web technologi es	• • •	To provide our services Assist our customers Respond to reviews Data analytics Marketing	•	IT, advertising, and analytics service providers	•	Website managemen t Advertising Verifying your identity	•	Yes. We share such information with marketing consultants to support our marketing efforts.
Audio, electronic, visual, thermal, olfactory, or similar information (e.g., pictures).	•	You (e.g., pictures submitted to CAH or recorded phone calls to Customer Care)	•	To provide our services Marketing Legal compliance	•	With the consumer's consent, we may post consumer- submitted photos to our Sites	•	Providing our services Marketing	•	No.
Professional or employment- related information.	•	You	•	To provide our services Data analytics Marketing Fraud/abuse prevention Legal compliance	•	Service providers or contractors (e.g., customer service or data analytics providers) Others you request (e.g., we can facilitate homebuyer- loan officer communication s)	•	Providing our services Determining eligibility for home ownership	•	No.
Education information, defined as information that is not publicly available personally	•	You	•	To provide our services, such as determining eligibility for home ownership Marketing	•	IT service providers and/or contractors Other consumers (e.g., when loan	•	Facilitating homebuyer- loan officer introduction s	•	No.



identifiable	officers include	
information as	education	
defined in the	information in	
Family	their profiles	
Educational	for viewing by	
Rights and	homebuyers)	
Privacy Act (20		
U.S.C. section		
1232g, 34 C.F.R.		
Part 99) (e.g.,		
whether you		
went to college).		

We do not sell your Personal Information as defined by applicable laws.

INFORMATION COLLECTED THROUGH TECHNOLOGY

CAH collects information, such as IP addresses, using technology. Standard features in Internet browser software such as browser cookies, flash cookies, and web beacons (collectively, "Cookies") allow websites to track certain user activities by assigning each of our visitors a unique number that resides on your computer. CAH uses Cookies to make the Sites more interesting and useful.

CAH's Cookies are limited to our Sites only. In addition to CAH's Cookies, various third parties may also place Cookies on your computer's hard drive when you visit our Sites. CAH also uses partners (e.g., Google) to serve ads to you while you are visiting other websites. These partners may collect information about your visits to our Sites and other websites in order to provide advertisements about goods and services of interest to you. Among other Cookies, we use Google Analytics. You can learn more about how those cookies work by visiting "How Google Uses Data When You Use Our Partners' Sites or Apps," located at www.google.com/policies/privacy/partners/. CAH does not guarantee and is not responsible for the privacy or security of these other websites and apps, including the accuracy, completeness or reliability of their information.

If you prefer not to have the benefits of Cookies, your internet browser or other third party software on your workstation or device can be adjusted to treat Cookies in different ways. Depending upon the type of browser you are using, you might be able to configure your browser: (i) to prompt you to accept or reject Cookies on an individual basis; or (ii) to prevent your browser from accepting any Cookies at all. You should refer to the supplier or manufacturer of your web browser for specific details about cookie security. For general information about how to manage Cookies, visit www.allaboutcookies.org/manage-cookies/ (please note that this website is not connected to us and we are not responsible for its content).



Rejecting Cookies might affect your ability to perform certain transactions on our Sites and our ability to recognize your browser from one visit to the next.

CAH does not respond to Do Not Track ("DNT") signals. Some third-party sites, including third-party advertising companies that CAH has a relationship with, however, do keep track of your browsing activities when they deliver content to you, which enables them to tailor what they present to you.

CALIFORNIA PRIVACY RIGHTS

Under the CCPA, California residents have the following rights:

- The right to know what Personal Information we have collected about you, including the categories
 of Personal Information, categories of sources from which we collected the Personal Information,
 the purpose for our collection or sharing of your Personal Information, the categories of third parties
 to whom we disclose Personal Information, and the specific pieces of Personal Information we have
 collected about you;
- The right to delete Personal Information we have collected from you, subject to certain exceptions;
- The right to correct inaccurate Personal Information that we maintain about you;
- The right to opt-out of the sharing of your Personal Information; and
- The right to not receive discriminatory treatment for exercising your privacy rights.

OTHER STATE PRIVACY RIGHTS

Colorado, Connecticut, Virginia, and Utah residents have the following rights:

- The right to confirm whether we process your Personal Information;
- The right to access your Personal Information;
- The right to delete certain Personal Information;
- The right to data portability; and
- The right to opt-out of our processing of your Personal Information for targeted advertising purposes.

In addition to the above, Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose; and
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.



Nevada provides its residents with a limited right to opt-out of certain Personal Information sales. However, please know we do not currently sell Personal Information triggering that statute's opt-out requirements.

HOW TO SUBMIT PRIVACY RIGHT REQUESTS

If you would like to submit a privacy right request, you can email your request to <u>info@ChristopherAlanHomes.com</u> or contact us by phone at 1-239-288-5905.

Following a request regarding your Personal Information, we will take commercially reasonable steps to verify your identity, including asking you to provide us with information to confirm your identity (e.g., your zip code, email address, phone number, or dates of employment (if applicable)). If you are an agent authorized to make a request on a California resident's behalf, please indicate that when submitting your request. Agents must generally provide a signed authorization evidencing their authority to act on behalf of another individual.

We will make good faith efforts to evaluate and act on your request, but there may be circumstances in which we do not grant your request. For example, we are not required to delete Personal Information needed (i) to provide a service we are contracted to provide (such as our warranty services), (ii) to detect fraudulent or illegal activity, (iii) for bookkeeping or tax purposes, or (iv) for legal purposes. Also, we are not required to provide access or deletion where your identity could not be verified, where the information would compromise others' privacy or other legitimate rights, like intellectual property rights, or where the information contains legally privileged material. If we determine that your request should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

Any requests that can be processed by us will be done so in no more than 45 days from the date we receive your request, unless we notify you that an extension is required. In case of an extended completion period, we will process your request in no more than 90 days from the date of your original request. Consumers are limited to two requests to know or access within a 12-month period.

If you wish to appeal CAH's decision with respect to a request to exercise any of the aforementioned rights, please contact us at <u>info@ChristopherAlanHomes.com</u>.



INTERNATIONAL USERS

The Sites are operated, in whole or in part, from the United States. If you are visiting from the European Economic Area or other regions with laws governing data collection and use that may differ from U.S. law, please note that you may be transferring your Personal Information to the United States, which does not have the same data protection laws as the EU, UK, Canada, or other countries. By using the Sites, regardless of where you live in the world, you consent to have your personal data transferred to, and processed in, the United States and allow us to use and collect your Personal Information in accordance with this Policy.

We do not use automated decision-making, including profiling, as part of our data collection practices.

Note that EU residents have the right to: (i) object to or restrict data processing as it relates to their Personal Information; (ii) be forgotten; and (iii) data portability. EU residents also have the right to withdraw their consent and file a complaint with the local supervisory authority. However, if you have a complaint regarding the processing of your Personal Information, we kindly request that you first contact us at info@ChristopherAlanHomes.com, and we will reply promptly.

Similarly, Canadian residents have the right to access their Personal Information, correct inaccurate Personal Information that we maintain about them, obtain a copy of their Personal Information, and withdraw consent for any Personal Information we collect. If you would like to submit a privacy right request, you can email your request to <u>info@ChristopherAlanHomes.com</u> or contact us by phone at 1-239-288-5905.

SECURITY MEASURES TAKEN TO PROTECT PERSONAL INFORMATION

We maintain appropriate organizational and technical measures for the protection of the security, the confidentiality, and integrity of Personal Information from unauthorized or unlawful access, accidental loss, destruction, damage, misuse, disclosure and alteration. However, no information system can be 100% secure, so we cannot guarantee the absolute security of your Personal Information. If CAH learns of a security system's breach, we will comply with all applicable law to notify you about the breach so that you can take protective steps.

INFORMATION SHARING

<u>Sharing of Personal Information between Affiliates.</u> We may disclose the Personal Information we collect from and about you through the Sites within CAH (including our worldwide affiliates and subsidiaries) to fulfill obligations to our clients and operate the Sites consistent with the Privacy Policy and applicable data protection law.



<u>Non-Affiliates/Associates/Service Providers/Joint Marketing.</u> We also share Personal Information with our "Associates," which are third parties that participate in the development or management of a community, or "Service Providers" to perform services or functions on behalf of CAH. Examples of Associates include accountants, attorneys, management companies, and banks. Examples of Service Providers include Information Technology providers, title insurance underwriters, and payment processors. In all instances, the parties described in this paragraph are required to hold the Personal Information we provide to them in confidence and use the Personal Information only to provide the services we have hired them to perform.

We may provide your Personal Information to trusted companies pursuant to a written agreement with them when we jointly market their services to you. One example is when we collaborate with another company to market a mortgage offer to you. The written agreement requires that they use your Personal Information only for the purposes of the joint marketing and that they not disclose it to others.

<u>Marketing.</u> We disclose Personal Information to non-affiliated third parties to perform marketing services or functions on our behalf or measure the effectiveness of our marketing efforts. They are contractually obligated to hold in confidence the Personal Information we provide to them and use the Personal Information only to provide the services we have hired them to perform for us.

We may also communicate with you through email to provide information including, but not limited to, community details, quick move-in home notices, and financial incentives. If you would like to opt out of email marketing communications and/or all other email communications, please contact us at info@ChristopherAlanHomes.com. Please note that by opting out of all email communications, CAH may only contact you by postal service and phone.

<u>Other Circumstances.</u> We may disclose your Personal Information that you consent to be shared, that you direct us to share, as reasonably necessary based on our relationship, or as required by law. For example, we may disclose your Personal Information in connection with a subpoena or other legal process, in an audit, when we record your mortgage or deed in public records, to professionals involved in a home sale (e.g., real estate agents, closing agents) when you purchase a home from us, or to a bank you request we disclose your Personal Information to. We reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful; in the interest of national security or law enforcement activities; other health and safety issues; or as reasonably necessary or appropriate under the circumstances. We may share information to prevent illegal uses of the Sites or defend ourselves against third-party claims. We may also share information with companies assisting in fraud protection or investigation.

We may also transfer user or customer information, including Personal Information, in connection with a corporate transaction, such as a proposed or actual sale, merger, transfer, or exchange of all or a portion of CAH.



CHILDREN'S PRIVACY

The Sites are intended for general audiences and is not directed to children under the age of 13. We do not knowingly collect Personal Information from children under the age of 13. If you become aware that a child has provided us with Personal Information without parental consent, please contact us at info@ChristopherAlanHomes.com. If we become aware that a child under the age of 13 has provided us with Personal Information consent, we will takes steps to remove such information from our records.

MISCELLANEOUS

<u>Privacy Policy Support</u>. If you have an inquiry or concern about our Policy, please contact us using the contact information below.

<u>Terms of Service</u>. This Notice is subject to, a part of, and incorporated into the Terms of Service, which can be found at <u>christopheralanhomes.com/legal/terms-of-service</u>.

<u>Changes and Updates to this Policy</u>. We may amend this Policy at any time in our sole discretion, but we will communicate with you, if and as required by law, when any changes are made. Please re-visit this page periodically to stay aware of any changes to this Policy. This Notice replaces all previous notices or statements with respect to this subject and cannot be modified orally by any of our representatives, employees or officers. If we modify this Policy, we will make it available through the Sites, and indicate the date of the latest revision. Your continued use of the Sites after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

<u>Third Party Links</u>. The Sites also may contain third-party links or features. We are not responsible for the collection and use of your Personal Information by such third parties that are not under our control. We encourage you to review the privacy policies applicable to third-party websites or features. For example, we may provide you with the ability to log into your account using social media or other third-party login features, such as those provided by Meta. We do not control these third-party services, your profiles on social media services, or determine how your Personal Information will be used by these third-party services. We are not responsible for any acts or omissions by any social media service or other third-party services that you choose to use.

<u>Ending Relationship</u>. If you end your customer relationship with us, this Policy will apply to Personal Information we collected while this Policy was in effect.



SHINE THE LIGHT LAW

Residents of the State of California, under California Civil Code §1798.83 (Shine the Light Law), have the right to request from companies conducting business in California a list of all third parties or affiliates to which we have disclosed Personal Information during the preceding year for direct marketing purposes. To make such a request, please contact us at info@ChristopherAlanHomes.com or by mail at the following address:

Christopher Alan Homes Attn: Legal Department 6330 Techster Blvd. Fort Myers, Florida 33966

NOTICE OF FINANCIAL INCENTIVE

We may offer our customers promotions or incentives that provide certain benefits, such as exclusive offers. We may also provide other programs, such as sweepstakes, contest, or other similar promotional campaigns (collectively, the "Programs"). When you sign up for one of these Programs, we typically ask you to provide your name and contact information (such as email address and/or telephone number). Because our Programs involve the collection of Personal Information, they could fall within California's definition of a "financial incentive" program. The value of your Personal Information to us is related to the value of the discounted products or services, or other benefits that you obtain or that are provided as part of the applicable Program, less the expense related to offering those products, services, and benefits to Program participants.

If you do not want us to collect the information requested, to use it to contact you, or to share it with our affiliates and any co-sponsors of the Program, please do not enter any sweepstakes, contest, or promotion. You may withdraw from participating in a Program at any time by contacting us at 1-239-800-2164 or info@ChristopherAlanHomes.com.

QUESTIONS OR COMMENTS

If you have any questions or comments about this Policy, please contact us at 1-239-800-2164 or <u>info@ChristopherAlanHomes.com</u>.



EFFECTIVE DATE

This Policy is effective as of January 1, 2023, and was last updated on July 5, 2023