

# **WEBSITE**

## **Part III: Privacy Policy**

Effective Date: [05/12/2026]

Last Updated: [05/12/2026]

### **1. Scope**

This Privacy Policy applies to:

- Personal Information collected from you and your representatives in connection with the Services.
- Personal Information collected from tenants, applicants, buyers, and other individuals in connection with property management, leasing, and sales activities.
- Personal Information collected through the Site, including but not limited to ‘cookies’ (small digital signature files that are stored by your web browser that allow your preferences to be recorded when visiting the Site). You may be able to block cookies via your browser settings but this may prevent you from access to certain features of the Website.

This Privacy Policy does not apply to:

- Aggregated or de-identified information that cannot reasonably be linked to an individual.
- Information collected by unrelated third parties for their own purposes.

### **2. Categories of Information Collected**

Information You Provide. This may include:

- Contact details (name, address, email, phone).
- Professional or employment information.
- Financial information (payment details; in some cases, creditworthiness data).
- Tenancy and leasing information.
- Communications with the Company (emails, forms, inquiries).

Information Collected Automatically. When you use the Site, the Company may collect:

- Device identifiers and IP addresses.

- Browser type and operating system.
- Usage data (pages viewed, actions taken).

Information from Third Parties. The Company may receive information from:

- Background check and credit reporting agencies.
- Public records.
- Other real estate professionals or Alliance Members acting as Cooperating Members.

### **3. How Information Is Used**

Primary Purposes. The Company uses Personal Information to:

- Provide, manage, and improve the Services.
- Evaluate and process lease or purchase applications.
- Communicate with you regarding the Services and your account.
- Manage relationships with tenants, applicants, and buyers.
- Comply with legal, regulatory, and recordkeeping obligations.

Secondary Purposes. The Company may also use Personal Information to:

- Improve the Site and user experience.
- Conduct analytics and reporting in de-identified or aggregated form.
- Protect the Company, its clients, tenants, and others from fraud and misuse.

### **4. Sharing and Disclosure**

The Company may share Personal Information with other Alliance Members acting as Cooperating Members solely to:

- Deliver Services under an Engagement Letter or Services Agreement.
- Coordinate cross-jurisdictional engagements where necessary.
- IT and security services.

In addition, the Company may share Personal Information with third-party vendors providing:

- Property management systems.
- Professional advisory services.
- IT and security services.

The Company may further disclose Personal Information:

- As required by law or legal process.
- To governmental or regulatory authorities upon lawful request.
- To protect rights, property, or safety of the Company, and its clients, tenants, or the public.

In the event of a merger, acquisition, or other corporate transaction, Personal Information may be transferred to a successor entity subject to this Privacy Policy or a policy that provides materially similar protections.

## **5. Your Choices and Rights**

Where permitted by Applicable Law, individuals may:

- Request access to Personal Information that the Company maintains about them.
- Request correction of inaccurate information.

If the Company sends promotional communications:

- You may opt out by following the instructions in the communication or contacting the Company using the information provided in the Engagement Letter, Services Agreement or on the Site.
- Depending on jurisdiction, individuals may have additional rights (such as deletion or objection), which will be honored as required by Applicable Law.

## **6. Safeguarding Information**

The Company has in place certain technological and operational security policies and procedures to protect your personally identifiable information from loss, misuse, alteration or unintentional destruction. The Company's personnel who have access to the data have been trained to maintain confidentiality of such information.

The Company recognizes its responsibility for protecting the online privacy of your Personal Information. If you have questions or comments about our administration of your Personal Information, or would like to opt out of receiving any marketing material from the Company, please contact the Company at [MAGRP@midamericagr.com](mailto:MAGRP@midamericagr.com). You may also use this address to communicate any concerns you may have regarding compliance with this Privacy Statement.

PLEASE REMEMBER THAT NO DATA TRANSMISSION OVER THE INTERNET CAN BE GUARANTEED TO BE 100% SECURE. AS A RESULT, WHILE THE COMPANY STRIVES TO PROTECT YOUR PERSONAL INFORMATION, THE COMPANY CANNOT ENSURE OR WARRANT THE SECURITY OF ANY INFORMATION YOU TRANSMIT TO THE COMPANY AND YOU DO SO AT YOUR OWN RISK. ONCE THE COMPANY RECEIVES YOUR TRANSMISSION, THE COMPANY SHALL MAKE ITS BEST EFFORT TO ENSURE THE SECURITY OF SAID INFORMATION ON ITS SYSTEMS.

Personal Information is retained:

- For as long as reasonably necessary to fulfill the purposes described in this Privacy Policy.
- As required by law, including real estate licensing recordkeeping rules and statutes of limitation.

## **7. International Transfers**

To the extent Personal Information is transferred across borders, such transfers will be carried out in compliance with Applicable Law and subject to appropriate safeguards where required.

## **8. Collection and Use of Children's Personal Information**

The Company's Site is not intended for anyone under the age of 18, and any said use of the Site is deemed a violation of the Company's Terms of Use, set forth in Part II. The Company does not knowingly collect any information, including Personal Information from children.

## **9. Marketing Materials**

The Company may use the information you provide to respond to your requests and provide you with the services that you ask to receive through the Site. The Company may also use this information to provide you with marketing materials, unless you opt out as provided below.

If you would like to opt out of receiving any marketing materials from the Company, please contact the Company at [MAGRP@midamericagrp.com](mailto:MAGRP@midamericagrp.com).

## **10. Changes to This Privacy Policy**

The Company may update this Privacy Policy periodically. The "Last Updated" date at the beginning of this document will reflect the most recent changes.

Material changes will be communicated via the Site or other appropriate means. Continued use of the Services or the Site after changes become effective signifies acceptance of the updated Privacy Policy.