

# PRIVACY POLICY

**Effective Date:** January 1, 2023

**Last Updated:** June 1, 2023

The Privacy Policy describes how Jay Paul Company and its affiliated entities (“Jay Paul” “we” and “us”) process personal information about you. This Privacy Policy applies when you visit or use our websites (“Site”), contact our customer service team, communicate with us on behalf of a vendor or customer, rent from us, use our services, or otherwise interact with us. It also applies when our clients provide your personal information to us in connection with the services we provide to them. Finally, it applies to information we collect in connection with your application to work for us or work as an employee or contractor.

You may download a copy of this Privacy Policy by clicking here. If you have any questions about our privacy practices or you have a disability and need to receive this Privacy Policy in a different format, please contact us at [privacy@jaypaul.com](mailto:privacy@jaypaul.com).

## Categories of Personal Information We Process

The type of information that we collect depends on your interaction and relationship with us. We collect, and in the preceding 12 months have collected and processed, the below categories and types of personal information with your consent or as otherwise required or permitted by law.

- **Contact Information.** We collect full name, email address, current and prior address, telephone number, and business contact information.
- **Identifiers.** We collect social security number, driver’s license number, government issued ID number, passport number, state identification card number, I-9 documentation, TSA Precheck/Global Entry number, internet protocol address, account usernames and passwords, vehicle license plate or VIN numbers, and signature.
- **Personal Characteristics or Traits.** We collect date of birth, gender, age, nationality, racial or ethnic origin, religion, marital status, citizenship status, military or veteran status, sexual preference or orientation, and disability information.
- **Financial Information.** We collect tax identification number, financial or bank account information, tax-related information, wire instructions, payment card number, payment card expiration date and CVV code, and billing address.
- **Commercial Information.** We collect records of products or services purchased, obtained, or considered and purchasing histories.
- **Professional or Employment Information.** If you apply to work for us or accept employment with us, we collect job application details, previous work history, reference information, professional memberships and certifications, dependency information, emergency contact information, health insurance information such as your policy number and spouse or dependent information, and travel booking details. To the extent permitted and required by applicable laws, we may collect

information about your medical and treatment history, diagnosis, dates of service, provider name, and your ability to work.

- **Education Information.** We collect education history, degrees, transcripts, qualifications and certifications.
- **Sensitive Information.** We may collect social security number, driver's license number, passport number, government issued ID number, state identification card number, racial or ethnic origin, religious or philosophical beliefs, or union membership, health information, criminal records, health records, and sexual orientation.
- **Inferences:** We use information from the categories of personal information described above in order to create a profile about you, to reflect your preferences, characters, behavior and attitude.

## Sources Of Personal Information

We collect, and in the preceding 12 months have collected, personal information in the following ways:

- **Directly from you.** We collect contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, education information, and sensitive information that you provide directly to us, including through our Site.
- **When you visit our locations.** When you visit our offices or facilities, we also collect contact information.
- **From third parties:** We may collect contact information, identifiers, personal characteristics or traits, commercial information, professional or employment information, and education information, from third-parties including our vendors, clients, recruiters, suppliers, subcontractors, and service providers.
- **From our employees or job applicants.** We collect contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, education information, and sensitive information from our current or former job applicants, contractors and employees.

## Use of Personal Information

We use personal information for the following business and commercial purposes:

- **Providing our Portfolio and Services.** We use contact information, identifiers, financial information, commercial information, and professional or employment information to allow clients to contract for space at our campuses, provide the services and amenities we have contracted for, and process payments.
- **Transactional Purposes.** We use contact information, identifiers, financial information, professional or employment information, and commercial information to: (i) communicate with you; (ii) provide you with customer assistance; (iii) administer contracts with our vendors, clients, and service providers; and (iv) provide supporting business activities such as billing and collections, procurement, and tax related activities;
- **Recruiting and Hiring.** We use contact information, identifiers, professional or employment information, education information, financial information, sensitive personal information, and

inferences make informed decisions on recruitment and assess your suitability for the role, communicate with you about your application, respond to your inquiries and schedule interviews, and to reimburse you for any agreed expenses incurred in the application process.

- **Employment Purposes.** We use contact information, identifiers, personal characteristics or traits, financial information, professional or employment information, education information, sensitive information, and inferences to administer all aspects of our employment or contractor relationship with you. For example, we use the information to complete new hire paperwork, enroll you in our human resource management system, conduct background checks, collate company directories and provide communication services, provide you access to our offices and IT systems, set up your personnel file, create benefits packages and provide and administer employee benefits, track your time and attendance and absences and to pay you and reimburse you for professional expenses, provide training, conduct performance and talent management activities, and to evaluate and process time off, sick leave, leaves of absence, or accommodation requests. For certain executives, we also use your information to complete lender due diligence and compliance reporting
- **Business Operations.** We use contact information, identifiers, personal characteristics or traits, financial information, professional or employment information, education information, sensitive information, and inferences for our day-to-day business operations including maintaining records, planning, budgeting, calibration, headcount, database administration, diversity metrics, surveys, evaluations, reports, compliance, regulatory, audit, investigative and disciplinary purposes and other ethics and compliance reporting tools, and to support our business operations.
- **Analytics.** We use identifiers, commercial information, and inferences to analyze preferences, trends and statistics.
- **Marketing and Promotional Purposes.** We use contact information, identifiers, financial information, professional or employment information, and inferences to improve our marketing efforts, conduct market research, prospect for new clients, engage in client relationship management, and to provide you with information about us, including personalized marketing communications.
- **Maintenance and Improvement of our Site and Systems.** We use contact information and identifiers to improve our Site and systems, provide and maintain functionality on our Site and systems, and help us diagnose technical and service problems and administer our Site and systems. Maintenance of our systems includes activities such as applying security controls for company systems, providing new system implementations, applying change management processes, and providing IT Service Desk / Help Desk Support.
- **Develop and Improve Our Portfolio and Services.** We use contact information, identifiers, financial information, commercial information, personal characteristics or traits, inferences, and professional or employment information to help us develop new products and services and to improve and analyze our existing products and service offerings.
- **Security and Fraud Prevention.** We contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, education information, sensitive information, and inferences to: (i) protect us, our employees, and our Site, premises, assets, systems, products, services and intellectual property, including from fraud, theft, and misconduct; (ii) enforce our policies and terms; (iii) conduct vendor due diligence; and (iv) detect and prevent fraud, theft and misconduct including by verifying the identity of those we are conducting business with.

- **Legal:** We use contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, education information, sensitive information, and inferences to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Other Purposes:** We may use contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, education information, sensitive information, and inferences for other reasons we may describe to you.

## Disclosure of Personal Information

We disclose personal information in the following circumstances:

- **Service Providers.** We may share personal information with vendors and service providers who support the operation of our services, website, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting, payment processing, order fulfillment, email delivery, marketing, insurance, operating systems and platforms, transportation, and customer support services). In some cases, the vendor or service provider may directly collect the information from you on our behalf. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, education information, sensitive information and inferences to our service providers.
- **Clients.** We disclose personal information with our clients in connection with their rental of space at our portfolio properties or the services and amenities we provide. In the past 12 months, we have disclosed contact information, identifiers, financial information, professional or employment information, education information and inferences to our clients.
- **Affiliates.** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, education information, sensitive information and inferences to our affiliates.
- **Professional Advisors.** We may share information with professional advisors, such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, education information, sensitive information and inferences to our professional advisors.
- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information,

professional or employment information, sensitive information and inferences to government entities.

- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments. We have not disclosed any personal information to corporate transaction recipients in the last 12 months.
- **Other Reasons.** We may disclose personal information for other reasons we may describe to you, including if you consent to the disclosure or direct us to disclose your information.

## We Combine Information

We combine information we obtain from different sources with publicly available information, including to create inferences about you. For example, we may combine information that we have collected offline with information we collect online. . We may also combine information we get from a third party with information we already have.

## Sensitive Personal Information

Unless specifically requested, we ask that you not send us, and you not disclose to us, through the Services or otherwise, any Sensitive Personal Information (e.g., social security number, taxpayer identification number, passport number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records, or information on other judicial or administrative proceedings).

## How Long We Keep Personal Information

We will retain and use your information for as long as we need it to provide you services or products, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Where we process personal information for marketing purposes, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing so that we can respect your request in future. We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data; and

- what the expectation for retention was at the time the data was provided to us.

## Cookies

We want you to be aware that certain online tools exist to help us serve and recognize you when you visit our website. We receive and store certain types of information when you visit our website. When you access the website, we (including companies we work with) may place small data files on your computer or other device. These data files may be web beacons, cookies, clear gifs, pixel tags, e-tags, flash cookies, log files, or other local storage provided by your browser or associated applications. These tracking technologies, which are often referred to collectively as cookies, allow us to understand how users navigate to and around our website, view different pages, access content and request Services. We may use them, for example, to keep track of your preferences and profile information and collect general usage and volume statistical information. If you want to remove or block cookies, you may be able to update your browser settings. You can find instructions on how to manage cookies on different types of web browsers at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Do Not Track Signals

Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not uniform across browsers. Accordingly, our Site is not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

## Links to Other Websites

Our Site may include links to other websites or applications whose privacy practices may differ from ours. If you submit personal information to any of those websites or applications, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit or application that you use.

## Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

## This Website is Not Intended for Children

We do not knowingly collect or store any personal information from anyone under the age of 16. If we become aware that we have collected or stored personal information from an individual under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [privacy@jaypaul.com](mailto:privacy@jaypaul.com).

## Marketing Communications

**Marketing Emails.** You can opt out of marketing or advertising emails by using the "unsubscribe" link or mechanism noted in communications you receive from us. You may also request to opt out of marketing or advertising emails by contacting us at [privacy@jaypaul.com](mailto:privacy@jaypaul.com). Once we process your request, we will cease using the information for such purposes at no charge to you. If you opt out of getting marketing messages, you will continue to receive messages from us about your relationship with us where permitted by law.

**Phone Calls and Text Messages.** If you do not want to receive marketing phone calls or text messages from us, please inform us that you no longer want to receive calls from us when you receive a call from us, or reply STOP to a text message from us. You can also opt-out of telemarketing by contacting us at [privacy@jaypaul.com](mailto:privacy@jaypaul.com).

## Processing in the United States

Please be aware that information we obtain about you will be processed in the United States by our service providers or us. By using the Site or our services, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

## California Privacy Rights/Notice to California Residents

**Shine The Light.** If you are a California resident, this section applies to you. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third-parties' direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at [privacy@jaypaul.com](mailto:privacy@jaypaul.com). and include "CA Shine the Light" in the subject line of your email.

**California Consumer Privacy Act.** This section applies to our privacy practices as required under the California Consumer Privacy Act, including as amended by the California Privacy Rights Act (together, the "CCPA").

Sale or Sharing of Personal Information. We do not "sell" or "share" (as those terms are defined in the CCPA), and in the preceding 12 months have not sold or shared, personal information. We do not knowingly sell or share the personal information of minors under the age of 16.

Use or Disclosure of Sensitive Personal Information. In the preceding 12 months, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Your Rights Under the CCPA. Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed personal information.
- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete personal information that we have collected from you. We may not delete all of your personal information if one of the exceptions to the CCPA applies.
- You have the right to opt-out of the sale or sharing of your personal information.
- You have the right to direct us to limit the use or disclosure of your sensitive personal information to only the purposes specified in the CCPA.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

**Exercising Your Rights.** To exercise any of your rights, please use our webform or call us toll free at 888-467-1716. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at [privacy@jaypaul.com](mailto:privacy@jaypaul.com).

**Other Consumer Rights Information.** Under California Civil Code Section 1789.3, we are required to provide California residents with the following information:

- Unless otherwise expressly stated, this Site is provided without charge.
- To file a complaint regarding this Site or to receive further information regarding use of this website, please contact us via email at [privacy@jaypaul.com](mailto:privacy@jaypaul.com). You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California's Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210.

**Removal of Content.** If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [privacy@jaypaul.com](mailto:privacy@jaypaul.com). Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.



## Contact Us

If you have any questions about this Policy or our data practices, please email us at [privacy@jaypaul.com](mailto:privacy@jaypaul.com). You can also write to us at:

Jay Paul Company  
Attn: Privacy Officer  
Four Embarcadero Center, Suite 3620  
San Francisco, CA 94111

## Updates to Our Privacy Policy

From time to time we may change our privacy policy. We will notify you of any material changes to our privacy policy as required by law. We will also post an updated copy on the website where this appears. Please check our website periodically for updates. The “Last Updated” legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on our Site.