

# **Copper Property CTL Pass Through Trust Privacy Policy**

## **1 INTRODUCTION**

Copper Property CTL Pass Through Trust (hereinafter, "CTLTrust" or "we," "us," or "our"), created this privacy policy to demonstrate our firm commitment to your privacy and the protection of your information. This policy covers how CTLTrust and its subsidiaries and affiliates manage information that may be used to identify you directly or indirectly ("Personal Information") that you submit, or that we collect and receive on our website at <https://www.ctltrust.net> (the "website") or through your use of our services (collectively, the "Services"). We provide the website and our Services to you subject to the following conditions (this "Privacy Policy").

For the purposes of this Privacy Policy, CTLTrust is a controller (*i.e.*, responsible party) for the practices described in this Privacy Policy. Additionally, this Privacy Policy does not apply to the extent that we process Personal Information in the role of a processor or service provider (as applicable) on behalf of our business customers. For more information about the privacy practices of a CTLTrust business customer or a customer affiliate, please contact the respective business customer directly. *We are not responsible for the privacy or data security practices of our business customers, which may differ from those set forth in this Privacy Policy.*

BY VISITING THE WEBSITE OR USING OUR SERVICES, YOU ACKNOWLEDGE AND AGREE THAT YOU HAVE READ THIS PRIVACY POLICY AND AGREE TO THE COLLECTION, USE AND OTHER PROCESSING OF YOUR INFORMATION IN ACCORDANCE WITH THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO ALL OF THE TERMS, CONDITIONS AND PRACTICES SET FORTH HEREIN, DO NOT ACCESS THE WEBSITE OR ANY OF OUR SERVICES.

## **2 CALIFORNIA CONSUMER NOTICE OF COLLECTION**

This Policy is provided to all California residents subject to this Privacy Policy. To access specific sections of this Policy, you may use the following links:

- [Introduction](#)
- [Information Collection and Usage](#)
- [Information Sharing and Disclosure](#)
- [How We Protect Your Personal Information](#)
- [Cookies and Other Tracking Technologies](#)
- [Linked Third Party Websites](#)
- [Web Browser Do Not Track Signals](#)
- [Data Retention](#)
- [Rights Related to Your Personal Information](#)
- [Children](#)
- [Privacy Policy Changes](#)
- [Contact Information](#)

## **3 INFORMATION COLLECTION AND USAGE**

The types of nonpublic Personal Information that we may collect depends on which of our Services you are utilizing. We may collect the following types of Personal Information:

- Information we receive directly from you in communications you send to us, including but not limited to, identification information such as name, e-mail address(es), and telephone number.

- Information obtained when verifying your registration when using our Services, including but not limited to, name and email address.
- Information we collect automatically from your browser or mobile device, including but not limited to, Internet Protocol address, type of mobile device, mobile operating system, browser type, geographic location, pages you visit and the information you request, and the date and time of your access.

CTLTrust uses the above-listed Personal Information only as permitted by law, including for the following purposes:

- To complete transactions and provide the Services authorized by you.
- For general business purposes, including but not limited to, to diagnose problems with the website, to notify you of new products or Services being released, to verify your identity, to troubleshoot problems, to enforce applicable terms for our Services, to protect our rights and property, and to customize, measure, and improve our Services.
- For other business purposes such as data analysis, identifying usage trends, determining the effectiveness of our Services and to enhance, customize and improve our features, products and Services.
- To comply with and enforce applicable legal requirements, agreements and policies, or to prevent, detect, identify, investigate, respond to and protect against potential or actual claims, liabilities, prohibited behavior and criminal activity.
- To perform other activities consistent with this Privacy Policy.

If you are no longer using our Services, we may continue to store and protect your Personal Information pursuant to this Privacy Policy, and as required by law, including but not limited to the following purposes: risk management, regulatory compliance, and audits.

We do not share your Personal Information with non-affiliated third parties for purposes of selling their products and services to you.

#### 4 **INFORMATION SHARING AND DISCLOSURE**

We may disclose, or in the past 12 months have disclosed, the Personal Information identified above in the following limited circumstances for business purposes:

- **Affiliated Companies.** We may disclose Personal Information with companies that are affiliated with us (for example, companies that control, are controlled by, or are under common control with us). We may also disclose Personal Information that is collected to our affiliates.
- **Organizations that Provide Services.** We may disclose your Personal Information with companies that perform services for us, such as data processing vendors. The information shared with these companies typically includes Personal Information to conduct our operations, follow your instructions as you authorize, or protect the security of our financial records. We may also disclose your Personal Information with third parties described below in the Cookies Section.
- **Potential Buyers.** In the event that we go through a business transition, such as a merger, another company acquires us or our affiliates, or we sell a portion of our assets, your Personal Information will, in most instances, be part of the assets transferred. Any successor entity shall be bound by terms and conditions reasonably similar to this Privacy Policy.
- **Other Parties.** We may disclose your Personal Information with other parties to comply with a legal obligation; to protect the legal rights of (or otherwise participate in a legal process pertaining to) our company, our personnel, our agents, our clients, and our affiliates; to protect the safety and security of our visitors, or to protect against fraud; or otherwise with your consent or as allowed by applicable law.

Generally, we do not sell, rent, lease or disclose your Personal Information to third parties except if you consent to such disclosure or as described in this Privacy Policy.

We reserve the right to disclose any Personal Information about you or your use of this website without your prior permission if we have a good faith belief that such action is necessary to: (i) protect and defend our rights, property or safety or that of those of our affiliates, other users of this website, or the public; (ii) enforce applicable terms for this website; or (iii) respond to claims that any content violates any law or the rights of third parties.

## 5 HOW WE PROTECT YOUR PERSONAL INFORMATION

We have reasonable and appropriate technical and organizational measures in place to protect against the loss, misuse, and alteration of your Personal Information under our control. We have taken reasonable steps to confirm the Personal Information is retained in secured facilities and that reasonable measures have been implemented for protection from unauthorized access. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Information.

However, no security system is impenetrable. We cannot guarantee the security of our website or databases, nor can we guarantee that Personal Information you supply will not be intercepted while being transmitted to us over the Internet.

## 6 COOKIES AND OTHER TRACKING TECHNOLOGIES

Every time you come to the website, our website's web server automatically collects information, including, in some instances, Personal Information, through cookies, web beacons, and other similar tracking technologies (collectively "cookies"). Cookies are small text files that are placed on your computer or mobile device when you visit a website. Cookies help the website remember information about your visit, which can make it easier to visit the website again and make the website more useful to you. Some cookies are deleted once you close your browser (session cookies), while other cookies are retained even after you close your browser so that you can be recognized when you return to a website (persistent cookies). More information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org). Generally, your email address and all other Personal Information is collected only when you voluntarily provide that data.

Cookies on our website are generally divided into the following categories:

| Cookie Type              | Description   |
|--------------------------|---|
| <b>Essential Cookies</b> | These are cookies that our website needs in order to function and that enable you to move around and use the website and features. Without these essential cookies, the website will not perform as smoothly for you as we would like it to, and we may not be able to provide the website or certain services or features you request. Examples of when these cookies are used include for troubleshooting and security purposes.  |
| <b>Analytics Cookies</b> | Analytics cookies provide us with information regarding how visitors navigate and interact with our website. Such cookies allow us to understand, for example, more about how many visitors we have to our website, how many times they visit us and how many times a user viewed specific pages within our Site. Among other Analytics cookies, we use Google Analytics cookies for these purposes. For more information about Google Analytics, please refer to "How Google Uses Information From Sites or Apps that Use Our Services," which can be found at <a href="http://www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a> , or any other URL Google may provide from time to time. |

We may use the information collected through cookies and related tracking technologies for the following purposes:

- To make our website easier to use and generally improve its performance.
- To gather metrics about how you interact with our website.
- For security reasons.
- To provide personalized content. For example, we may store user preferences, your default language, device and browser information, your profile information, which includes the level of your usage of the website, which you visit, so we can identify you across devices and personalize the content you see.

Most web browsers automatically accept cookies, but you can usually change your browser settings to prevent this. If you disable cookies, your ability to use some features of the website may be limited. For mobile devices, you may be able to manage certain cookies using your built-in mobile device settings and controls. Any choices concerning cookies are browser and/or device specific. If you clear your cookies from your browser on any of your devices, your choices will need to be reset. You should check how to do this on your device(s) and operating systems.

Some cookie providers may also offer opportunities to control your preferences. To learn how to opt-out of Google Analytics, an Analytics cookie, please visit <https://tools.google.com/dlpage/gaoptout>.

Some of these cookies may be placed by third party service providers to help determine the effectiveness of our advertising campaigns or email communications. The use of cookies by third party service providers is within their control and not ours. We do not control their websites or their policies and practices regarding your Personal Information, and you should be aware that different rules might apply to the collection, use or disclosure of your Personal Information by third parties in connection with their advertisements or promotions and other sites you encounter on the Internet. This Privacy Policy does not cover any use of Personal Information that a third party service provider may directly collect from you, and we do not undertake to confirm, investigate, or police their practices.

## **7 LINKED THIRD PARTY WEBSITES**

We may provide links to other third party websites through the Services solely as a convenience to you. However, such linking does not mean, and should not be interpreted to mean, that CTLTrust endorses, is affiliated with or makes any representations concerning such third party websites. CTLTrust neither reviews, controls, nor is responsible for these third party sites or any content therein. By using such links, you will leave the Services. If you decide to access any of the third party websites linked to the Services, you do so entirely at your own risk. CTLTrust shall not be liable for any consequences arising from use of any third party websites to which the Services link.

## **8 WEB BROWSER DO NOT TRACK SIGNALS**

At this time, we do not engage in activities that would subject us to the requirement to recognize universal opt-out signals under applicable law. For that reason, our website is not currently configured to respond to a browser's "do not track" or similar universal opt-out signals.

## **9 DATA RETENTION**

How long we retain your Personal Information depends on the context in which, and purposes for which, we collected it. We generally retain Personal Information for as long as necessary for achieving the purposes for which it was collected or processed, unless a different retention period is required by applicable law.

When we have no ongoing business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

## 10 **RIGHTS RELATED TO YOUR PERSONAL INFORMATION**

Depending on where you live and the types of Personal Information at issue, you may have certain rights with respect to your Personal Information. Please note that many of these rights are subject to exceptions and limitations. For example, certain laws generally do not apply to Personal Information that you provide to us while acting in your professional capacity.

- **Right of access:** You have the right to know whether your Personal Information is being processed, and, where that is the case, to request access to, including a copy of, the Personal Information undergoing processing.
- **Right to correction:** You have the right to request that we correct or supplement any inaccurate or incomplete Personal Information we process about you.
- **Right to deletion:** You have the right to request that we delete your Personal Information or as applicable anonymize your Personal Information.
- **Right to data portability:** You have the right to request that we provide the Personal Information which you provided to us in a structured, commonly used and machine-readable format; and you have the right to transmit such Personal Information to another entity.
- **Right to withdraw your consent:** Where our processing is based on your consent, you have the right to withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of the processing we conducted prior to your withdrawal.
- **Right to prohibit the sale or sharing (as the term is defined under applicable law) of Personal Information:** At this time, we do not sell or share your Personal Information.
- **Right to limit the processing of your sensitive Personal Information:** We do not currently use or disclose Sensitive Personal Information for purposes other than those which cannot be limited under applicable law.

If you choose to assert any of these rights under applicable laws, we will respond within the time period prescribed by applicable law. Please note that many of the above rights are subject to exceptions and limitations. If we are not able to provide the requested information or make the change you requested, you will be provided with the reasons for such decisions. Under local law, you may be entitled to lodge a complaint with your local data protection authority, such as your state Attorney General's Office.

Your rights and our responses will vary based on your state of residency. Please note that you may be located in a jurisdiction where we are not obligated, or are unable, to fulfill a request. In such a case, your request may not be fulfilled.

We do not discriminate against individuals who exercise any of their rights described in this Privacy Policy. However, CTLTrust may require use of your Personal Information to provide access to the Services. Therefore, when you exercise your deletion right, in particular, you may lose access to certain aspects of the Services that require your Personal Information.

### **Rights Request and Verification Process**

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. If you designate an authorized agent to submit requests to exercise certain privacy rights on your behalf, we will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission

you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Our verification process may also include a request for additional information to confirm your identity or your authorized agent's identity (such as your name, email address and date of birth) or to obtain proof that you have given your authorized agent permission to act on your behalf. If our verification process is successful, we will respond to your request within the time and in the manner required by applicable law. If we cannot validate the identity of you and/or your authorized agent or obtain proof that you have given your authorized agent permission to act on your behalf, we will attempt to contact you to inform you.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm that the Personal Information relates to you. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the Personal Information from one entity to another entity without hindrance, specifically by electronic mail communication. Further, if you would like to appeal any decision we make about your request, you may contact us as stated in the "Contact Information" section below.

## 11 **CHILDREN**

Our Services are not directed toward children under the age of thirteen, and we do not knowingly collect any Personal Information from children under the age of thirteen. If a child provided this website with Personal Information, we ask that a parent or guardian send us a written request to the address listed below and we will promptly delete the child's Personal Information from our records.

## 12 **PRIVACY POLICY CHANGES**

CTLTrust is always improving our Services. As our Services evolve, we may update or amend this Privacy Policy. If we modify this Privacy Policy, we will post the revised Privacy Policy online. The revised Privacy Policy will be effective immediately at the time of posting, unless a later effective date is expressly stated therein. We will also revise the "Last Updated" date stated below.

Should any modification materially change how we use your Personal Information, we will provide notice online prior to the effective date of the change.

It is your responsibility to periodically review this Privacy Policy. Users are bound by any changes to this Privacy Policy by using our Services after such changes have been posted. If you do not agree to the newly posted Privacy Policy, your only remedy is to discontinue use of the website.

## 13 **CONTACT INFORMATION**

If you have any questions regarding this privacy policy, you may contact us via the information provided below:

Jessica Cummins  
(847) 313-4755  
[jcummins@hilcoglobal.com](mailto:jcummins@hilcoglobal.com)

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