

Privacy Policy

This Privacy Policy sets out the privacy practices and policies of Churchill Forge Properties (“we,” “us,” “our,” and the “Company” in connection with information, data, documentation, and any other materials related to or about you (“Your Data”) that is collected, stored, or transmitted through your use of or interaction with any website maintained or operated by us (the “Website”) and the services that we provide to you (the “Services”).

We are committed to protecting individual privacy and maintaining your trust. It is important to us that we provide you with information that relates to our collection, use, and disclosure of information that can be reasonably linked with you ("Personal Information"). Your Data includes your Personal Information.

Application of Privacy Notice

This Privacy Notice describes how we use, share, and protect Your Data. It also describes the rights and choices regarding use, access to, and correction of Your Data to the extent applicable.

The Website may contain links to other third party websites. The information practices and content of such third party websites are governed by their own privacy notices. You should review the privacy notices of such third-party websites to understand their information practices because we do not control those third-party websites and their practices may differ from our approach.

What Information We Collect and Why

We and our service providers collect Your Data in various ways, such as when you: provide us with Your Data when you use the Services; fill in information on a form or other document that we might send or make available to you; contact our customer service; or send any inquiries or communications to us. We may also collect Your Data from other sources, including publicly accessible databases and marketing partners.

The Personal Information that we might collect from you includes:

- Contact information: First and last name, email address, employer, phone number, and physical address;
- Financial information, if a leasing application is completed; and
- Any other information identified in a leasing application, if you completed an application.

We will use reasonable efforts to identify what pieces of information are mandatory and must be provided in order for us to provide the Services to you. If you do not provide all of the necessary information, we may not be able to provide some or all of the Services to you. If you disclose anyone else’s Personal Information to us or to our service providers in connection with the Services, you represent that you have the authority to do so.

We collect additional data through your interaction with the Website, such as browser and device information, application usage data, cookies, pixel tags, and other similar technologies, and IP addresses.

"Do Not Track" is a preference that you may be able to set in your browser to let websites you visit know that you do not want them collecting certain information about you. We do not currently respond to, or honor, Do Not Track signals or requests from your browser.

How We Use Personal Information

We and, where appropriate and necessary, our service providers use Your Data for the following purposes:

- Providing our Services to you;
- Communicating with you;
- Administering any account that you might have with us;
- Providing and improving our customer service;
- Analyzing and improving our Services;
- Responding to your inquiries, for example, when you send us questions, suggestions, compliments or complaints, or when you request information about our Services;
- Aggregating and/or anonymizing or de-identifying Personal Information so that it will no longer be considered Personal Information, for the purpose of our legitimate interest (to anonymize and aggregate for business purposes). We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual. Where we maintain or use de-identified data, we will continue to maintain and use the de-identified data only in a de-identified fashion and will not attempt to re-identify the data; and
- Carrying out general business activities for purpose of our legitimate business interests such as keeping our Services updated) and where necessary to comply with our legal obligations. These activities may include:
 - Data analysis, for example, to improve the efficiency of our Services;
 - Audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;
 - Fraud prevention and fraud security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;
 - Enhancing, improving, repairing, maintaining, or modifying our current Services.

How We Disclose Your Data

We will only disclose Your Data, including your Personal Information, that we collect from you to external parties as indicated below:

- *Our Affiliates.* We may disclose Your Data, including Personal Information, to any of our subsidiaries and affiliates.
- *Service Providers.* We may disclose Your Data, including Personal Information, to our service providers who perform certain services necessary to run our business, provided that each applicable service provider has entered into an appropriate agreement with us to protect the Personal Information shared with it, limit their use, retention, and disclosure of the Personal Information, and assist us with our compliance requirements.
- *Legal Request.* We may disclose Your Data to comply with applicable law and our regulatory monitoring and reporting obligations, to respond to requests from public and government authorities, to cooperate with law enforcement, or for other legal reasons.
- *Business Transaction.* We may disclose Your Data to a third party in the event of investment, financing, merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, business, or stock, whether as a going concern or as part of bankruptcy, liquidation, receivership, or similar proceeding in which Personal Information held by us is among the assets to be transferred.
- *Enforcement of Our or Others' Rights.* We may disclose Your Data to external parties the extent that this is necessary to enforce or protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others, including enforcing any other agreements (such as for billing and collection purposes and fraud prevention).

Children

We do not knowingly collect Personal Information from children under the age of sixteen (16) without authorization by a holder of parental responsibility. If you believe that we may have collected Personal Information from or about a child under the age of sixteen (16), please send an email to dataprivacy@churchillforge.com with the subject line "Personal Information of a Minor."

How We Protect Your Personal Information

We use commercially reasonable organizational, technical, and administrative measures to protect Your Data within our organization. Although we make good faith efforts to store data under our control in a secure operating environment that is not open to the public, we do not and cannot absolutely guarantee the security of Your Data. If we become aware that Your Data have been disclosed in a manner not in accordance with this Privacy Policy, we will use reasonable efforts to notify you of the nature and extent of the disclosure (to the extent we know that information) as soon as reasonably possible and as permitted or required by law.

If we collect your payment card information, we will comply with all applicable Payment Card Industry Data Security Standards (PCI-DSS).

Retaining Your Data

We retain Your Data for as long as needed or permitted in light of the purpose for which Your Data were obtained and consistent with applicable law. We take the following factors into consideration when determining how long we keep Your Data:

- The duration of an ongoing relationship with you;
- Whether there we are subject to a legal obligation that tells us how long we need to keep Your Data; or
- Whether retaining Your Data is advisable, as determined by us, when assessing our legal obligations and risks.

Choices Regarding Your Information

We offer you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from:

- Receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by following the "unsubscribe" option contained in each email.
- Receiving other promotional text communications, like SMS. If you no longer want to receive marketing related texts, you may opt out by replying "STOP" to any message you may receive from us.

Keeping Your Information Updated

It is up to you to keep Your Data supplied to us in our Services up to date. If applicable, you can update Your Data in your account. If you are unable to update Your Data, you can contact us as described in the "Contact Us" section below.

Individual Requests

You may ask us about the following:

- Request disclosure of the categories and specific pieces of Personal Information that we have collected about you;
- Request disclosure of the purpose(s) for which your Personal Information has been collected;
- Receive a list of the categories of third parties to which we have disclosed your Personal Information;
- Request that we delete any Personal Information that it has collected from you unless we need to keep your Personal Information to keep providing the Services to you or meet any of our legal obligations;

- Not be discriminated against by us for exercising any of the rights described in this Section; and
- Designate an authorized agent to exercise any of the individual rights described in this Section on your behalf.

International Visitors

The Service and our Website are hosted in the United States and intended for use solely by individuals in the United States. We do not currently direct its service outside of the United States and is not monitoring where you might be located. If you choose to use the Service or our Website from any other regions of the world with laws governing data collection and use that may differ from United States law, then please note that you are transferring your Personal Information outside of those regions to the United States for storage and processing. Unless specifically stated, we do not direct the Services into any country outside of the United States.

Updates to This Privacy Notice

From time to time, we may change the terms of this Privacy Policy. We will use reasonable efforts to notify you of changes by posting updated text on the Website or in other Services that we maintain. Your continued use of the Website or Services after any revisions are made, whether we are able to provide advance notification or not, constitutes your acceptance of those changes. To ensure that you are aware of current privacy practices, we recommend that you check this page of the Website periodically.

Contact Us

If you have any questions or complaints related to any of the terms or practices in this Privacy Policy, please feel free to contact us at dataprivacy@churchillforge.com. If you would like to submit a request for your Personal Information controlled by us, please contact us at dataprivacy@churchillforge.com.

Churchill Forge Properties, 129 Newbury Street, Boston, MA 02116.

Effective Date: March 6, 2025