

Privacy Policy

Last updated: May 1, 2025

Our Respect for Privacy

Paradigm ("**Paradigm**", "**Company**", "**we**", "**our**", or "**us**") respects the importance of the privacy of your personal information. The Company provides this Privacy Policy so you know about our information handling and storage practices and understand how we treat the information we receive about you from your access or use of the Site and its content, products, and services, including individual property websites accessible from the foregoing link (collectively, the "**Services**") made available in the United States by Paradigm. By accessing or using the Services, you agree to the terms of this Privacy Policy.

Use of the Services is strictly voluntary. If you do not agree to this Privacy Policy, you must immediately log off the Services and may not access or use the Services.

Your Consent

BY SUBMITTING YOUR PERSONAL INFORMATION TO THE COMPANY, OR BY THE COMPANY RECEIVING YOUR PERSONAL INFORMATION FROM THIRD PARTIES, YOU ARE CONSENTING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION IN THE UNITED STATES AND TO THE COMPANY'S USE OF YOUR PERSONAL INFORMATION AND ANY RELATED INFORMATION IN THE MANNER DESCRIBED IN THIS PRIVACY POLICY, INCLUDING THE TRANSMISSION TO, AND STORAGE AND PROCESSING OF YOUR PERSONAL INFORMATION BY US OR THIRD PARTIES. IF YOU ARE SUBMITTING PERSONAL INFORMATION ABOUT THIRD PARTIES TO THE COMPANY, YOU WARRANT AND REPRESENT YOU HAVE THEIR CONSENT TO PROVIDE THEIR PERSONAL INFORMATION TO THE COMPANY AND YOU WILL INDEMNIFY THE COMPANY AND HOLD THE COMPANY HARMLESS FROM AND AGAINST CLAIMS BY SUCH INDIVIDUALS RELATING TO THE COMPANY'S PROCESSING AND USE OF SUCH PERSONAL INFORMATION WITHIN THE TERMS OF THIS PRIVACY POLICY.

The Information We Collect

Online Activities. When you use our Services, we may collect information about your visit and store that information, which are records of the activities relating to the use of our Services. Our servers automatically capture and save the information electronically. The information we collect helps us administer the Services, analyze usage, protect our websites and their content from inappropriate use, and improve the visitor's experience. The information may be used for marketing purposes and may uniquely distinguish your browser or computer from others' devices. Examples of information that we may collect or that third parties may collect while you navigate our website include, but are not limited to:

- Your Internet protocol or "IP" address;
- The name of your Internet service provider;
- The city and state from which you access our website;
- The type and version of browser, operating system, computer, or mobile device you use;
- Screen resolution;
- A list of your browser's plug-ins;
- Installed fonts;
- Other technical characteristics of your browser, computer, or device;

- The links you click within our websites and the pages you visit;
- The date and time of your visit;
- The web page from which you arrived to our Services; and
- Certain searches/queries that you conducted via our Services.

Cookies. In order to register for an account with, to make purchases from, or to make full use of the Services, your browser must be set to accept “cookies.” Cookies are alphanumeric identifiers that we transfer to your computer or mobile device in order to enable the Services to "recognize" you every time you visit and to "remember" any information you have saved.

The Company recognizes that you have a choice to refuse cookies. However, should you decide not to accept cookies from the Services, you may limit the functionality we can provide when you use the Services. View your browser's help file for more information on cookies.

Some website content is served by third parties. These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies, to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Your Transactions With Us. We also collect information you give us directly, including:

- Information you give us on applications or other forms, such as transaction documents, online forms, e-mails, registration forms, or other documents or submissions related to the services we provide, including your name, address, telephone number, social security number, email address, employment information, education history, marital status, bank account information, and information about your assets, debts, and income;
- Information about your transactions with us, our affiliates, or others, such as your account history, transaction balances, payment history, overdraft history, parties to transactions, and your reasons for doing business with us;
- Information we may receive from third parties, such as consumer reporting agencies, regarding your creditworthiness and credit history, and to verify your identity;
- Information we may obtain to verify representations made by you, such as your employment history or income.
- Contact information, including SMS and email, for purposes of our marketing to you. You have the right to opt out of marketing communications by following the opt-out instructions in those communications.

To create and/or submit an application or request to the Services you will need to provide your email address, and other personal and non-personal information. By creating and/or submitting an application or request, you are authorizing us to collect, store and use your email address in accordance with this Privacy Policy.

Other Activities. When you engage in certain activities through the Services, such as registering as a user of the Services or sending Paradigm a message using the Services, Paradigm may ask you to provide

personal information. If you choose to share any personal information with Paradigm, you will see that the amount and type of personal information Paradigm requests depends on how you use the Services. It is completely optional for you to engage in these activities.

Advertising Service Providers. In addition, we may use third-party service providers to serve ads on behalf of Paradigm across the Internet. They may collect anonymous information about your access and use of the Services, and your interaction with the products and services of the Company. They may use cookies and other online tools such as pixel tags and action tags to serve ads and personalize your web experience based on your prior visits to our websites. They may also use information about your visits to our websites and other websites to target advertisements for products and services. This anonymous information is collected through the use of a cookie. No personally identifiable information is collected or used in this process. These third-party service providers do not know your name, phone number, address, e-mail address, or any other personally identifying information about you. Many third-party service providers are members of the “National Advertising Initiative” (“NAI”). If you would like more information about this practice or to opt out of having this anonymous information used by third-party service providers who are NAI members, visit the NAI consumer opt-out page by clicking here: www.networkadvertising.org/choices/.

Chatbots. The Services may make use of chatbots. Your Conversation with the chatbot is recorded, used, and shared. Sometimes we use chatbots to communicate with potential customers. By submitting a question/prompt to the chatbot, or similar feature, you consent to the recording, collection, processing, disclosure, retention, and use of your question(s)/prompt(s) and the chatbot’s response(s) (the “Conversation”). We may collect, process, retain and use the Conversation for the following purposes: communication with you, fraud prevention, research, development, analytical and archival purposes, and to improve, maintain and provide the chatbot or other services, and to assist you further if you contact us. We may associate your Conversation with other information about you. You agree that we may share the Conversation with our service providers or other third parties. The service providers or third parties may use the Conversation to assist us with associating information about you to the Conversation or to help us with customer support or technical questions. You agree that if you include your contact information, such as your telephone number or email address, your contact information may be used to associate information about you to the Conversation and that we may contact you using the contact information you provided.

How We Use Your Personal Information

Paradigm uses personal information to provide and improve its products and services, including the Services, for purposes in its legitimate interests, and for compliance with applicable laws. Paradigm processes personal information on the basis that it is: (a) necessary for the performance of a contract Paradigm has with you; (b) in Paradigm’s or a third parties’ legitimate interests; (c) where you give Paradigm your consent; or (d) for compliance with a legal obligation.

Paradigm may use your IP address to, among other things: (a) help diagnose problems with the Paradigm server, administer the Services, measure the use of the Services, and improve the content of the Services; (b) identify visitors’ domain names, the type of web browsers used, the pages viewed, the websites from which a visitor found the Services, the search terms and search engines used to find the Services; and (c) gather other web analytics information relating to visitors’ use and navigation of the Services. This information does not identify you personally. On occasion Paradigm may aggregate this data with data on the pages visited by other users to track overall visitor traffic patterns and provide this aggregate information to vendors, potential advertisers, business partners, news agencies, or other

parties to demonstrate the amount of interest in the Services and to help Paradigm plan for technical infrastructure requirements.

Paradigm may use your personal information for particular activities, including, without limitation, processing your application; payment processing; storing personal information on your behalf for your own use; customer service; marketing and research; studies, making referrals; providing product, promotional and other information to you; and to contact you.

Paradigm may share your personal information and any other information you provide to our affiliates, referral partners, financial service providers, lenders, or other business partners in connection with any of the activities described in this Privacy Policy or otherwise engaged in by you through your use of the Services. In addition, Paradigm may share this information with consumer reporting agencies.

Note that we do not have any responsibility for the actions or policies of any business partners, many of which may themselves have relationships with other businesses. You should satisfy yourself about how your information may be used by any business partner.

We may use the information the Services collect and that you provide (other than payment processing information), in an anonymous or aggregated format that does not identify you personally, which uses might include, without limitation, to evaluate existing products, services, and systems; to assist in the development of new products or services; research; and to identify trends and changes.

We may disclose personal information in any of the following circumstances: (a) in response to a subpoena, search warrant, court order, or other legal process or request, or as may otherwise be required by applicable law or regulation; (b) to protect and defend our rights or property or those of its affiliates or business partners, or others; or (c) as Paradigm, in its sole discretion, believes is appropriate under exigent circumstances in response to a perceived threat to the personal safety, property, or rights of any person or organization.

In addition, since our database is a business asset, in the event Paradigm is reorganized or becomes part of another organization, you consent to the sale, assignment, or transfer of your personal information to a successor that acquires substantially all of the business assets of Paradigm or to an affiliate, as applicable.

Paradigm will never request your password, user name, financial account information or other personal information through e-mail. This practice, called “phishing,” is a scam designed to steal your personal information. If you receive an e-mail that looks like it is from us asking you for your personal information, do not respond.

Your Options Regarding Personal Information

You may request that we correct, update or amend your Personal information we collect and maintain. To update us regarding changes in your Personal Information, please contact us as described below.

You may elect to opt-out of receipt of email and text communications from us by following the instructions provided in such communications or by contacting us as provided below. Even after opting out, you may still receive service oriented, non-promotional communications from us and promotional communications from other third parties as a result of their own interactions or transactions with you. Please allow time for us to process your request or contact us should you have any concerns about your opt-out request.

Your browser may offer you a “Do Not Track” or “DNT” option, which allows you to opt out of certain online tracking activities. Many websites and applications, including ours, do not currently support Do Not Track requests at this time because DNT signals are not yet uniform. This means we may collect information about your online activity both while you are using the Services and after you leave our properties, as described above. For more information about DNT signals, please visit <http://allaboutdnt.com>. Other third-party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

You may also follow the steps provided by initiatives that educate users on how to set tracking preferences for most online advertising tools. These resources include the Network Advertising Initiative (<https://thenai.org/about-online-advertising/>) and the Digital Advertising Alliance (<https://digitaladvertisingalliance.org/>). The Digital Advertising Alliance also offers an application called AppChoices (<https://youradchoices.com/appchoices>) that helps users to control interest-based advertising on mobile apps.

How Long We Keep Personal Information

We retain personal information in accordance with any records retention policy or program we may implement from time to time. We will retain personal information for the length of time necessary to fulfill the purposes for which we collected the personal information or to demonstrate we have fulfilled our duties or obligations, or retention periods required by applicable law or in which claims may be made or the existence of legal proceedings.

Links to Other Websites

The Services may provide links to other websites or resources over which we do not have control ("External Web Sites"). Such links do not constitute an endorsement by Paradigm of those External Web Sites. You acknowledge that we are providing these links to you only as a convenience and further agree that we are not responsible for the content of such External Web Sites. Your use of External Web Sites is subject to the terms of use and privacy policies located on the linked to External Web Sites.

Security of Your Personal Information

Paradigm takes reasonable precautions to protect the security of data and information, including personal information. Paradigm will attempt to ensure that your personal information will be subject to appropriate safeguards and that it is processed and secured in accordance with applicable law. However, Paradigm cannot guarantee against any loss, misuse, unauthorized disclosure, or alteration or destruction of data or personal information. While Paradigm strives to protect your personal information, Paradigm cannot guarantee the security of any information you transmit to, from, or within the Services, by email or otherwise, and you provide such information at your own risk. You acknowledge that: (a) there are security and privacy limitations in computer systems and on the Internet which are beyond the control of Paradigm; (b) the security, integrity, and privacy of any and all information and data exchanged between you and Paradigm through the Services, including personal information, cannot be guaranteed; and (c) any such information and data, including personal information, may be viewed or tampered with by a third party while such information or data is being used, transmitted, processed, or stored.

Children's Online Privacy Policy

Our Services are not directed to children under the age of 18, and we do not knowingly collect Personal Information from children under the age of 18 on these Services. In addition, we do not sell any Personal Information of minors under 18 years of age.

Changes to Privacy Policy

This Privacy Policy may be updated periodically to reflect relevant changes in our information practices. We will post a notice on our Services to inform you of significant changes to this Policy. We will also provide additional information regarding changes to this Privacy Policy as may be required by law. Your continued use of our Services following our posting of any such changes will mean that you accept such changes.

For further information or if you have any questions about this Privacy Policy, please contact us in one of the following ways:

By online message at:

<https://www.paradigmcos.com/contact-us>

By telephone at:

703-527-7500

Or by U.S. mail to:

Paradigm
1515 North Courthouse Road, Suite 600
Arlington, VA 22201

Please clearly state what information you are requesting and any other requests you are making.