DOMUM PRIVACY POLICY

Last Updated March 21, 2024

DOMUM REAL ESTATE VENTURES LLC, DOMUM REAL ESTATE VENTURES II LLC, DOMUM REAL ESTATE FUND I LP, and DOMUM REAL ESTATE FUND II LP (collectively "Domum", "we", "us" or "our") are committed to protecting your ("you" or "your") privacy and empowering you with this privacy policy (this "Privacy Policy"). This Privacy Policy explains how we collect, use, disclose, and apply the Personal Data (defined below) collected when you use or access our online website, our mobile applications, and other products and services that link to this Privacy Policy (collectively, the "Services"). Our Terms of Service (the "Terms") are expressly incorporated herein by reference and are an integral part hereof. The Terms can be found here: https://app.domumgroup.com/privacypolicy/. Capitalized terms that are not expressly defined in this Privacy Policy have the same meaning as set forth in the Terms.

By using the Services or interacting with us, you are agreeing to this Privacy Policy. Please read the following carefully to understand how we collect, use, disclose, and maintain your Personal Data. In addition, this Privacy Policy describes your choices for use, access, and correction of your Personal Data. If you do not agree to be bound by this Privacy Policy, please stop using the Services.

1. <u>Changes to this Privacy Policy</u>. We may change this Privacy Policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our Services. We will post the changes to this page and encourage you to review this Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, we may provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your Services account.

2. <u>Information We Collect and Receive</u>. We collect information that alone or in combination with other information in our possession could be used to identify you ("*Personal Data*") as follows:

2.1 Information You Provided to Us. We collect Personal Data that you decide to share with us. At times, we may require you to provide certain Personal Data in order to use certain parts of our Services, fulfill your requests, or provide you with certain Services.

Personal Information. To protect the personal information of individuals, subject 2.1.1 to applicable law, Domum permits access only by authorized employees who need access to that information to provide services to Investors and Domum's investment funds. An individual Investor's right to privacy extends to all forms of contact with Domum, including telephone, written correspondence and electronic media. To safeguard any non-public information about Investors (such information, "Confidential Information"), Domum maintains physical, electronic, and procedural safeguards that comply with U.S. federal standards. Confidential Information includes investment information, contact and banking information, and details of designated trustees or financial advisors. Domum will not disclose Confidential Information, except (i) to its affiliates as allowed by applicable law or regulation, (ii) to its accountants, attorneys, placement agents and service providers in the ordinary course of business or (iii) as otherwise required by law, including any money laundering or antiterrorist laws or regulations. Typically, the Confidential Information Domum discloses is information it receives on subscription agreements or other forms, such as name, address, account or tax identification number, capital commitment, remaining capital commitment and other relevant information. Domum may also disclose to service providers, on an as needed basis, information about transactions with Domum or other account data. Any party that receives this information will use it only for the services required and as allowed by applicable law or regulation, and is not permitted to share or use this information for any other purpose.

2.2 *Information We Obtain from Others*. We may receive the Personal Data described in this Privacy Policy from other sources, such as:

2.2.1 <u>Third-Party Services</u>. We may collect Personal Data from third-party services, such as advertising partners and analytics providers.

2.2.2 <u>Other Sources</u>. We may collect Personal Data about you from other publicly available sources.

2.3 Information We Automatically Collect. We automatically collect certain Personal Data from you when you use the Services, including internet or other network activity information such as your IP address, unique device identifiers, browsing and search history (including content you have viewed in the Services), and Cookies (as defined below).

2.3.1 <u>Automatic Data Collection</u>. In order to improve, personalize, and optimize our Services and meet our legal obligations, we may automatically track certain information about your visits to and usage of our Services, including your browser type, operating system, IP address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), device identifier, domain name, clickstream data, referring/exist pages, geolocation, and a date/time stamp for your visit. We also use this information to analyze trends, administer the Services, deliver advertising, perform research, provide technical and customer support, inform our product development efforts, protect our legal rights, address disputes, and prevent our Services from being used to commit harmful or unlawful activities, including fraud. Some of this information may also be collected so that when you use the Services again, we will be able to recognize you and optimize your experience accordingly.

2.3.2 <u>Device Information</u>. We may collect information about the devices you use to access our Services, including the hardware models, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information.

2.3.3 <u>Crash and Error Information</u>. If the Services crash or return an error, we may collect data to determine the cause of the error using first or third party services. The crash or error information collected may include the following: Device IP address, device name, operating system version, application configurations(s), the time and date, and other statistics.

2.3.4 <u>Messages</u>. We collect and process, which includes scanning and analyzing, information you provide in the context of composing, sending, or receiving message through the Services' messaging functionality. That information includes the content of the message and information about when the message has been sent, received and/or read, as well as the participants of the communication.

2.3.5 <u>Metadata</u>. When you upload content, you automatically upload certain metadata that is connected to the content. Metadata describes other data and provides information about your content that will not always be evident to the viewer. In connection with your content the metadata can describe how, when, where, and by whom the piece of content was collected and how that content is formatted. Additionally, metadata will consist of data that you chose to provide with your content.

2.3.6 <u>Cookies</u>. Like many online services, we use "cookies" to collect technical information. Cookies are small pieces of information that a website sends to your computer's hard drive while you are viewing the website. We may use both session cookies (which expire once you close your

web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Services. We may use cookies to collect information about your IP address, browser type, operating system, device type and identifiers, platform type, as well as your usage of and activity on and the performance of our Services. These types of information are collected to make the Services more useful to you and to tailor your online experience to meet your interests and expectations.

3. <u>How We Use Your Information</u>.

(a) We may use the Personal Data that we collect for our legitimate interests and the limited purpose of providing and improving the Services, as described in the Terms and in this Privacy Policy including with your consent, and as permitted by applicable laws. These purposes include circumstances where it is necessary to provide or fulfill the Services requested by or for you or where you have given us your express consent. We may use your Personal Data:

- (i) To fulfill requests for products, services, functionality, support and information for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes and to solicit your feedback;
- (ii) To customize the content you see when you use the Services;
- (iii) To send promotional materials from us or on behalf of our affiliates and trusted third parties;
- (iv) To understand how you use the Services and to improve and develop our Services and conduct product development;
- (v) To measure and understand the effectiveness of the advertising we serve to you and others and to deliver targeted advertising;
- (vii) To use your content as part of our advertising and marketing campaigns to promote the Services;
- (viii) For billing purposes and to prevent fraud, abuse and illegal activity on the Services, on the basis of our legitimate interests in ensuring a safe and secure environment in which you can conduct business and in order to comply with our legal obligations;
- (ix) To ensure that you are old enough to use the Services;
- (x) To service your Account and communicate with you, including to notify you about changes in our Services;
- (xi) To enforce our Terms and other policies;
- (xii) Consistent with your permissions;
- (xiii) To inform our algorithms;
- (xiv) To enable you to search based on the information the other has made available on the Services, and information others have provided about them;

(xv) For any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

(b) We may aggregate and/or de-identify information collected through the Services and from other sources so that such information can no longer be linked to you or your device ("*Aggregate/De-Identified Information*"). We may use Aggregate/De-Identified Information for any purpose, including, without limitation, for research and marketing purposes

4. <u>How We Share and Disclose Information</u>.

4.1 Service Providers. To assist us in meeting business operations needs and to perform certain services and functions, we may share Personal Data with vendors and service providers, including providers of hosting services, cloud services, and other information technology services providers, event management services, email communication software and email newsletter services, advertising and marketing services, payment processors, customer relationship management and customer support services, and web analytics services. Pursuant to our instructions, these parties will access, process, or store Personal Data in the course of performing their duties to us. We take commercially reasonable steps to ensure our service providers adhere to the security standards we apply to your Personal Data.

4.2 *Corporate Affiliates.* We may share Personal Data with our current and future affiliates, meaning an entity that controls, is controlled by, or is under common control with Company. Our affiliates may use the Personal Data we share in a manner consistent with this Privacy Policy.

5. <u>Your Choices</u>.

(a) If you have registered for an account, you may access, review, and update certain Personal Data that you have provided to us by logging into your account and using available features and functionalities or by contacting us in accordance with the "Contact Us" section below. You may also delete your account. Please note that we will need to verify that you have the authority to delete the account and certain activity generated prior to deletion may remain stored by us and may be shared with third parties as detailed in this Privacy Policy.

(b) You have a choice about the placement of cookies on our website. You can use your web browser to directly block all cookies, or just third-party cookies, through your browser settings. Using your browser settings to block all cookies, including strictly necessary ones, may interfere with proper site operation. Guidance on how to control cookies in popular browsers is contained <u>here</u>: <u>Microsoft Internet Explorer</u>, <u>MacOS Safari</u>, <u>Mozilla Firefox</u>, and <u>Google Chrome</u>. You can also manage third-party advertising preferences for some of the third parties we work with to serve advertising across the Internet by utilizing the choices available at <u>www.networkadvertising.org/managing/opt_our.asp</u> and <u>www.aboutads.info/choices</u>.

(c) You have a choice at any time to stop us from sending you emails for marketing purposes by following the "unsubscribe" link included in these messages. Please note that despite any indicated email marketing preferences, we may continue to send you administrative emails regarding Domum, including, for example, notices of updates to our Terms or this Privacy Policy, if we choose to provide such notices to you in this manner.

(d) In certain circumstances providing Personal Data is optional. However, if you choose not to provide Personal Data that is needed to use some features of our Services, you may be unable to use those features.

(e) Some browsers offer a "Do Not Track" option. Domum does not utilize technical measures to track your activities across different web sites or online services, whether your browser's Do Not Track feature is configured or otherwise. Third-party application programming interfaces controlled by third parties may attempt to track activity across other sites that utilize those interfaces.

6. <u>Security</u>. We take reasonable precautions intended to help protect your Personal Data that we collect. Unfortunately, no system or online transmission of data is completely secure, and we cannot guarantee the security of data transmitted across the Internet. If you believe that Personal Data that you provided to us is no longer secure, please notify us immediately using the contact information provided below.

7. <u>California Residents</u>.

(a) If you are a resident of the State of California, you have certain rights afforded to you under the California Consumer Privacy Act or the "*CCPA*". When we say "*Personal Information*" in this section, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is aggregated or information that cannot be reasonably linked to you.

(b) We collect Personal Information and Non-Personal Information for the business and commercial purposes described in the section above titled "How We Use Your Information", and we share Personal Information with the categories of third parties described in the section above titled "How We Share and Disclose Information". We do not sell (as such term is defined in the CCPA) the Personal Information we collect (and will not sell it without providing a right to opt out).

- (c) Subject to certain limitations, the CCPA provides California residents the following rights:
 - (i) You have the right to request that we disclose to you the Personal Information we collect, use, or disclose, and information about our data practices;
 - (ii) You have the right to request that we delete your Personal Information that we have collected from you;
 - (iii) You have the right to request that we no longer sell your Personal Information to third parties;
 - (iv) We will not discriminate against you for exercising any of these rights.

(d) California residents may make a request pursuant to their "right to know", "right to request deletion", and/or "right to opt-out" under the CCPA by contacting us in accordance with the "Contact Us" section below. In order to verify your request to know or delete information, we may require you to provide us with certain information to be used solely for the purpose of verifying your identity.

(e) Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. We may request that your authorized agent have written permission from you to make requests on your behalf and may need to verify your authorized agent's identity.

8. <u>GDPR</u>. If you are a resident of the European Union, Domum will process your personal information in compliance with the EU General Data Protection Regulation ("GDPR"). For information

submitted using the System, Domum is the data controller, as defined under GDPR. In accordance with GDPR, as a data subject you will be accorded with any applicable rights, which may include the following: right of confirmation; right of access; right to rectification; right to erasure; right of restriction of processing; right to data portability; right to object; right to withdraw data protection consent; and the right to lodge a complaint with a supervisory authority.

9. <u>Information Retention</u>. We will retain Personal Data as required to comply with privacy requests, to manage active accounts, as required by law, in order to resolve disputes or enforce our agreements. We will retain Personal Data we process on your behalf and as directed by you. We may also retain copies of your Personal Data for disaster recovery purposes.

10. <u>International Users</u>. By using our Services, you understand and acknowledge that your Personal Data will be transferred from your location to our facilities and servers in the United States, and where applicable, to the servers of the technology partners we use to provide our Services.

11. <u>Links to Third-Party Websites</u>. The Service may contain links to other websites not operated or controlled by us, including social media services ("*Third Party Sites*"). The Personal Data that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

12. <u>Updates</u>. Domum reserves the right to update this notice from time to time by posting a new notice on the System or by delivery via electronic mail. Your continued use of the System after such changes are made constitutes acceptance of those changes.

13. <u>**Contact Us.**</u> If you have any questions or concerns about our Privacy Policy, please contact us via email at <u>communications@domumgroup.com</u>.