

PRIVACY POLICY

Last Updated: [June 11, 2018]

I. INTRODUCTION

This Privacy Policy (“Privacy Policy”) applies only to the websites and services (including www.republicfamilyofcompanies.com) controlled by Republic Properties Corporation, including but not limited to Republic Properties Corporation, Republic Urban Properties and Republic Holdings Corporation (“Republic,” “we,” “us,” or “our”) where this Privacy Policy is posted (the “Sites”). Please read this Privacy Policy carefully, as it discloses our collection, storage, use, and disclosure of the information collected through the Sites.

PLEASE NOTE THE ARBITRATION PROVISION SET FORTH BELOW, WHICH MAY, EXCEPT WHERE AND TO THE EXTENT PROHIBITED BY LAW, REQUIRE YOU TO ARBITRATE ANY CLAIMS YOU MAY HAVE AGAINST REPUBLIC ON AN INDIVIDUAL BASIS. ARBITRATION ON AN INDIVIDUAL BASIS MEANS THAT YOU WILL NOT HAVE, AND YOU WAIVE, THE RIGHT FOR A JUDGE OR JURY TO DECIDE YOUR CLAIMS, IF ANY, AND THAT YOU MAY NOT PROCEED IN A CLASS, CONSOLIDATED, OR REPRESENTATIVE CAPACITY.

II. INFORMATION COLLECTED

We collect information from you in two ways: (i) when you voluntarily submit information to us through the Sites; and (ii) when you use the Sites. This information includes both personal information and non-personal information. “Personal information” is any information relating to an identified or identifiable natural person. “Non-personal information” includes technical information that does not identify an individual personally. Please note that over time, non-personal information may become personal information due to regulatory developments, technological advancements, or the co-mingling of personal and non-personal information. We collect the following information from and about you:

- If you contact us through the Contact form, you will be asked to provide your name and email address so that we may respond to your inquiry or request. You may also provide your company name, phone number, and physical address, though this is voluntary.
- If you apply to lease an apartment, you will be asked to provide your name, physical address, social security number, telephone number, income, and employment details.
- When you use the Sites, we automatically collect certain information about how you and your devices interact with the Sites. This includes features you use, the web pages you visit, the search terms you enter, browser type, device type, IP address, device identifiers, and data about the performance of the Sites and any problems you experience with them. We use cookies and other similar technologies to collect this information. A cookie is a small text file that a website asks your browser to store on your computer or mobile device. For more information about cookies, please see **Section VII** below.

III. USE OF INFORMATION COLLECTED

We use your personal information collected on the Sites for the following purposes:

- To provide and improve our services and the Sites;
- To respond to inquiries;
- To track and analyze your usage of the Sites;
- To conduct email campaigns; and
- To alert you of special offers, updated information and other new services offered by Republic.

IV. DISCLOSURE OF INFORMATION

We may share or disclose your personal information in the following instances and to the following parties:

- To our affiliated companies, who are offering services that we believe may be of interest to you or who require your personal information for administrative and/or internal business purposes;
- To third party service providers, agents or independent contractors who help us maintain our Sites and provide other administrative services to us;
- To third parties as part of any corporate reorganization process including, but not limited to, mergers, acquisitions and sales of all or substantially all of our assets;
- To law enforcement in order to comply with the law or in the good faith belief that such action is necessary in order to conform to the requirements of the law or comply with legal process served on us, protect and defend our rights or property, or act in urgent circumstances to protect the personal safety of our end users; and
- To protect against potential fraud, we may verify with third parties the information collected from the Sites.

V. COLLECTION AND USE OF INFORMATION FROM CHILDREN

The Sites are directed to persons 18 years of age or older. We do not knowingly collect, distribute, or share any information from persons under 18 years of age. If we become aware that a child under 18 years of age has provided information to us, we will delete such information as soon as possible.

VI. OPTING-OUT

If you no longer wish to receive marketing communications from us, you can opt-out by following the unsubscribe instructions provided in the marketing communication or by contacting us at [jkramer@republicpropertiescorp.com]. We will process your unsubscribe as soon as possible, but please be aware that in some circumstances you may receive a few more messages until the unsubscribe is processed.

Please note that even if you opt-out of marketing communications, we will still send you administrative messages regarding the Sites, including, for example, administrative confirmations, important updates regarding the Sites, and notices regarding this Policy.

VII. COOKIES AND ADS

We use, and allow certain third parties to use, cookies and other similar technologies to provide our services and to help collect information. We, or third parties, may use session cookies or persistent cookies. Session cookies only last for the specific duration of your visit and are deleted when you close your browser. Persistent cookies remain on your device's hard drive until you delete them or they expire. We use the following types of cookies:

- Essential. Some cookies are essential in order to enable you to move around our Sites and use their features. Without these cookies, we cannot enable appropriate content based on the type of device you are using.
- Browsing and Functionality. These cookies allow us to remember choices you make on the Sites, such as your preferred language and the country from which you are visiting, and provide enhanced, more personalized features.
- Performance and Analytics. We work with service providers that use cookies and web beacons to collect information about your visits to the Sites and to other websites you may visit, and to serve advertisements to you across the Internet based on that information. In particular, we use Google Analytics to track website usage and activity. You can opt-out of the Google Analytics Advertising Features we use by indicating your preference using the interest-based opt-out link [here](#). Google also provides a complete privacy policy and instructions on opting-out of Google Analytics [here](#).
- Targeting Advertising. We receive audience based data (such as pixel traffic and conversion data) from the social media platform providers Facebook and LinkedIn, based on information such as IP addresses. We use this information to serve ads to you and enable marketing tracking. To block or limit this activity, please visit the sites below:
 - Facebook: You should see a link to the opt-out when you select "Why am I seeing this?" when using Facebook. You can also select "Hide all from this advertiser" within Facebook to stop seeing our ads. More information can be found on Facebook's site.
 - LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931/manage-advertising-preferences>

Please check your browser and browser settings to determine where cookies are stored and whether and how they may be deleted. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. Please visit www.networkadvertising.org to learn more. Note that opting-out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted-out will no longer deliver ads tailored to your preferences and usage patterns. In any event, if you reject our cookies, you may still use the Sites, but you may be limited in some of the features.

VIII. THIRD PARTY LINKS AND PLUG-INS

Our Sites may contain links to third party websites. We are not responsible for the privacy practices or content of such other websites. If you have any questions about how these other websites use your information, you should review their policies and contact them directly.

The Sites also offer you the ability to interact with plug-ins from the following social media sites: Facebook and LinkedIn. Republic may know that you clicked on a social plug-in or receive other information from these social media sites. Similarly, if you have previously provided personal information to a third party operating a plug-in on the Sites, then this third-party may recognize you on the Sites. Your use of social network plug-ins is subject to each social media site's privacy policy and other terms and conditions, which may be different from ours, so please read these policies carefully to understand their policies and your options. As with linked sites, Republic has no control over the information that is collected, stored, or used by social network plug-ins.

IX. SECURITY

No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information you transfer to Republic is done at your own risk.

Once we receive your transmission, we make reasonable efforts to ensure security on our systems. If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Sites or providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Sites. We may post a notice on our Sites if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

X. DISPUTE AND AGREEMENT TO ARBITRATE

EXCEPT WHERE AND TO THE EXTENT PROHIBITED BY LAW, by using the Sites, you and we agree that, if there is any controversy, claim, action, or dispute arising out of or related to your use of the Sites, or the breach, enforcement, interpretation, or validity of this Privacy Policy or any part of it ("Dispute"), both parties shall first try in good faith to settle such Dispute by providing written notice to the other party describing the facts and circumstances of the Dispute and allowing the receiving party thirty (30) days in which to respond to or settle the Dispute. Notice shall be sent to:

- Us, at Republic Properties Corporation, 1201 Maryland Avenue, SW Suite 850, Washington, DC 20024, or
- You, at the address we have on file for you.

Both you and we agree that this dispute resolution procedure is a condition precedent that must be satisfied before initiating any litigation or filing any claim against the other party. IF ANY DISPUTE CANNOT BE RESOLVED BY THE ABOVE DISPUTE RESOLUTION PROCEDURE, YOU AGREE THAT THE SOLE AND EXCLUSIVE JURISDICTION FOR SUCH DISPUTE WILL BE DECIDED BY BINDING ARBITRATION ON AN INDIVIDUAL BASIS. ARBITRATION ON AN INDIVIDUAL BASIS MEANS THAT YOU WILL NOT HAVE, AND YOU WAIVE, THE RIGHT FOR A JUDGE OR JURY TO DECIDE YOUR CLAIMS, AND THAT YOU MAY NOT PROCEED IN A CLASS, CONSOLIDATED, OR REPRESENTATIVE CAPACITY. Other rights that you and we would otherwise have in court will not be available or will be more limited in arbitration, including discovery and appeal rights. All such disputes shall be exclusively submitted to JAMS (www.jamsadr.com) for binding arbitration under its rules then in effect, before one arbitrator to be mutually agreed upon by both parties.

The arbitrator, and not any federal, state, or local court or agency, shall have exclusive authority to resolve any dispute arising under or relating to the interpretation, applicability, enforceability, or formation of this Privacy Policy, including any claim that all or any part of this Privacy Policy is void or voidable.

XI. CHOICE OF LAW

For US residents, this Privacy Policy has been made in, and shall be construed in accordance with, the laws of the District of Columbia, without giving effect to any conflict of law principles. The parties acknowledge that this Privacy Policy evidences a transaction involving interstate commerce. Notwithstanding the provision in the preceding paragraph with respect to applicable substantive law, any arbitration conducted pursuant to the terms of this Privacy Policy shall be governed by the Federal Arbitration Act (9 U.S.C. §§ 1-16).

XII. ASSIGNMENT

In the event that all or part of our assets are sold or acquired by another party, or in the event of a merger, you grant us the right to assign the personal and non-personal information collected via the Sites.

XIII. YOUR CALIFORNIA PRIVACY RIGHTS AND DO-NOT-TRACK DISCLOSURES

California Civil Code Section 1798.83 permits visitors to the Sites who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at (202) 552-5300 or [info@republicpropertiescorp.com].

At this time our Sites do recognize automated browser signals regarding tracking mechanisms, which may include “Do Not Track” instructions.

XIV. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Privacy Policy from time to time. When we do, we will also revise the “Last Updated” date at the top of this Privacy Policy. If material changes are made to the Privacy Policy, we will notify you by placing a prominent notice on the Sites. We encourage you to periodically review this Privacy Policy to keep it up to date on how we are handling your personal information.

XV. CONTACTING US

If you have any questions about our privacy practices or this Privacy Policy, please contact us at:

Republic Properties Corporation
1201 Maryland Avenue, SW Suite 850
Washington, DC 20024
(202) 552-5300
[info@republicpropertiescorp.com]