

# **SWIRE PROPERTIES INC. PRIVACY NOTICE**

Last update: August 2025

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This is the Data Privacy Notice (“Privacy Notice”) of Swire Properties Inc. and its affiliate and subsidiary entities (“Swire”). Swire is committed to protecting the information that is entrusted to us. This Privacy Notice explains how we collect, use, disclose, and protect your personal data.

We maintain websites to provide products and services to you. These websites collect personal data to provide our products and services, enhance your experience, and provide you with other relevant information about our offerings. This Privacy Notice applies both to activities Swire engages in on its websites and activities that are offline or unrelated to its websites (collectively “services”). We are providing this notice to explain our information practices and the choices you can make about the way your information is collected and used.

This Privacy Notice governs our treatment of personal data. We expect all our employees and those with whom we share personal data to adhere to this Privacy Notice.

This Privacy Notice applies to all personal data collected, used, stored, and disclosed by Swire, relating to all customers, guests, employees, suppliers, and others who do business with us. It also covers personal data disclosed to us via mail, our websites, or telemarketing. This Privacy Notice does not describe privacy policies and practices of websites and platforms that we do not provide, including those linked to, or integrated with, our websites (e.g., Facebook or Instagram). It also does not cover personal data you may choose to share with other users of our websites.

We process your personal data where it is necessary for the performance of a contract, where required by law, or with your consent. We may also process your data for our legitimate interests, provided those interests are not overridden by your rights.

"Personal Data" is any information that identifies or reasonably could be linked to a particular person or household. It includes things like email addresses, phone numbers, mailing addresses, payment card information, account numbers, and government-issued identification numbers. These are just examples and there are many other types of information that would be considered Personal Data.

By using our services and submitting your Personal Data, you agree that we may collect, use, disclose, and otherwise process your Personal Data in accordance with this Privacy Notice. If you do not agree with this Policy, do not use our services. For EU users, you may affirmatively opt in to such collection, use, storage, treatment, or disclosure.

## **1. NOTICE OF MONITORING**

We may enable chat functionality on our website. Please note that if you use the chat function on our website, all information you send and receive will be recorded by us and by the vendor we use to operate the chat. If you do not wish for us to record this information, please do not use the chat function on our website. By using the chat function, you consent to our monitoring all communications.

## 2. PERSONAL DATA WE COLLECT AND USE

### Personal Data You Provide

We may use information we collect directly from you for marketing purposes, to communicate about topics we believe may interest you, or to respond to requests. We only collect Personal Data that you provide to us or that we are authorized to obtain by you or by law. The processing of data listed below is based on our legitimate interest. When we rely on our legitimate interest, we will always assess whether your interests or fundamental rights and freedoms do not outweigh our interests. Otherwise, processing is based on your consent. You have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on consent prior to such withdrawal. Depending on our interactions, we may have collected the following categories of Personal Data within the past 12 months:

- When we market to you via email: We or our third-party marketing partners use your Personal Data for our marketing purposes, depending on your marketing preferences. The Personal Data collected for these purposes includes your name and email address. You can opt out of our marketing emails at any time.
- When you connect to our complimentary Wi-Fi: We may collect your name, email address, zip code, device identifiers, location information, device type and operating system and marketing preferences.
- When you contact us with questions or RSVP to an event: We collect your name, email address, and phone number.
- When you visit us in person: We may collect your name, email, phone number, age, date of birth, and national origin or country of residence, as well as security camera footage in public areas.
- When you interact with us on social media, including for giveaways: We collect your name, phone number, social media handle/identifier, email address, and any correspondence you send or direct to us.
- When you claim a gift with purchase: We collect your name and signature.
- When you inquire about purchasing or leasing a residential property: When you call us to inquire about purchasing a property, calls are recorded for quality assurance. Additionally, we collect your name, phone number, current city, email, and information about your search criteria, and we use this information to respond to your inquiry or to send you information (including marketing information) about things that may be of interest to you. When you purchase a residential property from us, we also collect your passport or driver's license number to verify your identity along with banking information (if applicable). You have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on consent prior to such withdrawal.

- When you are a vendor: If you are a vendor, we collect your company name, tax ID or Social Security number, address, phone number, email address, and banking information for the purpose of processing payment.

### **Information Automatically Collected From Your Browser Or Device**

We may collect and process the following Personal Data from your device or browser. The processing is based on our legitimate interest. When we rely on our legitimate interest, we will always assess whether your interests or fundamental rights and freedoms do not outweigh our interests, otherwise processing is based on your consent. You have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on consent prior to such withdrawal. The data may be used for the following purposes:

- When you connect to our complimentary Wi-Fi: We may collect your device identifiers, location information, device type, and operating system.
- When you interact with us through our website: We may collect your IP address, information regarding your interaction with our website, network location based on your IP address, and information you type into our online forms.
- When we market to you via email: We may collect non-identifiable data about how you interact with our marketing emails. This includes whether you opened the email, deleted it without opening, clicked on a link or unsubscribed. The processing is based on our legitimate interest.
- When you interact with us on social media, including giveaways: We may collect your name, phone number, social media handle/identifier, email address, and any correspondence you send or direct to us.
- Secure our Systems and Network: We may use your Personal Data as part of our efforts to keep the websites safe and secure and to protect others from harm or abuse, including: device and usage information, such as your IP address, browser and device characteristics, your computer or device's operating system, referring URLs, device name, country, location, information about how and when you use our websites and other technical information.

### **Information Collected from Third Parties**

We may also obtain information about you from other sources, including Service Providers and Third-Party Services, and use it for the following purposes:

**Engaging with you on social media:** If you interact with us on social media or use features, such as plugins, widgets, or other tools made available by social media platforms or networks (including Facebook, Instagram, or X (formerly Twitter)) in connection with our website, we may receive information about your interaction such as your name, social media handle, and other information about your profile which you may have made public. Processing is based on your consent. You

have the right to withdraw your consent at any time, without affecting the lawfulness of the processing that occurred prior to such withdrawal.

### **Other Ways We May Use Your Information**

Your privacy matters to us. We collect the information needed to provide you with our products and services and take your privacy and security seriously. We use the information provided by you or on your behalf to provide our products and services, such as our commercial leasing and in-person events. In addition, we use or disclose Personal Data for the following business purposes:

- To operate, evaluate, and improve our business, including improving and personalizing the experience for you and others;
- For marketing campaigns, under certain circumstances, with your permission;
- Using Data Analytics to audit, analyze, and improve our offerings while protecting our website users;
- For safety and security, by making sure third parties protect your information, and monitoring the technical functioning and security of our network;
- For legal and compliance, including complying with applicable laws, regulations, and legal obligations; and
- To protect the rights or property of the Company, its employees, and users of our services.

We use Personal Data for these purposes to comply with applicable legal obligations. Otherwise, the processing is based on our legitimate interest. When we rely on our legitimate interest, we will always assess whether your interests or fundamental rights and freedoms do not outweigh our interests.

**We do not sell the Personal Data of children under the age of 16, to anyone nor do we share that Personal Data with third parties for those parties' commercial use.**

### **3. HOW WE SHARE PERSONAL DATA**

We may share information about you to third parties as indicated below:

*Affiliates, Subsidiaries, and Locations:* We may share your Personal Data with our affiliates, subsidiaries, and locations. If we share your information, we will share only the information that is necessary, and we will take reasonable steps to ensure that third parties take prudent steps to protect your information.

*Service Providers, Suppliers, Agents, and Business Partners:* Other companies sometimes provide certain services to us or on our behalf (e.g., maintenance, IT support, analysis, development, security). Unless we tell you differently or as described elsewhere in this Privacy Notice, our service providers are not permitted to use your information for any purpose other than to provide the contracted services.

*Compliance with Legal Obligations:* We may need to disclose certain information to auditors, government authorities, law enforcement, regulatory agencies, our legal counsel, third party litigants and their counsel, or other authorized individuals when required to comply with applicable laws, or other legal obligations such as contractual requirements.

*Changes in Business Structure/Ownership:* We may disclose or transfer your Personal Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of the Company's business, assets, or ownership interest.

#### **4. COOKIES AND SIMILAR TECHNOLOGIES**

This section describes how we use cookies and similar technologies to collect and store information when you visit our websites. Like many companies, we use certain technologies – cookies, web beacons, clear GIF's, tracking pixels, and similar technologies (collectively, “cookies”) – to collect information when you interact with our website and email communications.

##### **How Do Cookies Work**

A “cookie” is a small text file that websites send to your computer, mobile device, or other Internet-connected device to identify your browser or to store information or settings in the browser. A “web beacon”, also known as an Internet tag, pixel tag, or clear GIF, links web pages to web servers and the cookies and may be used to transmit information collected through cookies back to a web server.

Cookies are classified by their purpose:

- **Essential** – These cookies are required for the website to function and allow you to access features that are fundamental to a service. You cannot disable these.
- **Personalization** – Allow the website to remember choices you make (such as your username, language, or the region you are in) and provide enhanced, more personal features. For example, a website may provide you with local weather reports or traffic news by storing data about your general location.
- **Analytics** – Help us understand how the websites perform, how visitors interact with the websites, and whether there may be technical issues. These cookies and similar technologies help us to enhance the content, quality, and features of our sites.
- **Targeted Advertising** – Used to deliver advertising that is more relevant to you and your interest. May be also used to limit the number of times you see an advertisement and measure the effectiveness of advertising campaigns.

The websites use first-party cookies and third-party cookies. The difference between first-party cookies and third-party cookies relates to the control of the party who serves the tracking technology. First-party cookies are specific to the website that created them. Their use enables us to operate an efficient service and to track the patterns of behavior of visitors to the website. Third-party cookies, on the other hand, are placed on your device or served by a third party (i.e., not by us). While we may allow third parties to access the websites to place these cookies on users'

devices, we do not retain control over the information supplied by the cookies, nor do we retain access to that data. This information is controlled by that third party in accordance with their respective privacy policy. To learn more about your options for cookie management, see “Managing Cookies and Opting Out” below.

## **Cookies We Use**

Our sites use cookies, web beacons, Jjava scripts, and similar technologies to collect certain information about your activity when you visit our websites. These technologies may collect your Internet Protocol (IP) address, network location, device ID, country of residence, zip code, demographic information, information relating to interests and preferences, information provided by enabled location services on devices, home and work locations when device location sharing is enabled, and information about your interaction with our websites.

This data helps us to analyze usage trends, improve site performance, track users’ movements through our websites, and gain insights into the general demographics of our audience. All data is reviewed on an aggregated basis and is not used to identify individual users.

## **Behavioral Tracking/Third Party Cookies**

We use third-party analytics services on our websites, including Google Analytics. The information that is collected about your use of the website is de-identified or pseudonymized by the third-party analytics provider (i.e. Google) for the purpose of evaluating your use of the sites, compiling reports on website activity, and providing other services relating to website activity. The third-party analytics providers that we use will not link your IP address with any other data held by them about you. Information collected by us through use of third-party analytics includes website interaction, number of visitors, where they visit the website, and the pages visited.

To learn more about Google Analytics, visit: <https://policies.google.com/technologies/partner-sites>.

## **Managing Cookies and Opting Out**

To learn more about your options for cookie management, you can click on “Cookie Settings” in the footer of any page of the website.

When you land on our website, a pop up will appear to inform you about our use of cookies. You can disable cookies used for personalization, analytics, and targeted advertising by selecting “Manage Preferences” on the banner or by clicking on “Cookie Settings” in the foot of the webpage to access our Cookie Management Platform. On the Cookie Management Platform, toggle the button to the off position for each type of cookie you want to disable. Essential cookies required enable basic website functionality cannot be disabled.

You may withdraw your consent at any time with effect for the future by following the process outlined above. If you reject cookies, only necessary cookies and a cookie to remember your preferences will be set on your device. The consent banner will be presented upon your initial visit to the site and may reappear under certain circumstances, including when an update to our cookie

policy necessitates renewed consent, when you clear your stored cookies or preferences, or upon the expiration of your prior consent, which occurs every 30 days.

Most web browsers allow at least some control of most cookies through browser settings. You may refuse the use of cookies by selecting the appropriate settings on your browser to decline cookies.

You may choose to delete cookies placed on your device and to block new third-party cookies from being placed by using your internet browser's privacy and security settings. Please visit the following websites to learn more (depending on the browser you use):

- Firefox, Microsoft Edge, Internet Explorer, Google Chrome and Safari.
- Please note, if you disable cookies, you may not be able to use the full functionality of our websites. In particular, you may have limited access to some areas or be transitioned to a different experience.
- You may also disable JavaScript at any time through your browser settings. Please note, however, that certain features of the websites may not operate as intended, and some areas of the sites may be inaccessible without JavaScript enabled..

**You may choose to delete non-essential cookies placed on your device and to block new third-party non-essential cookies from being placed by using your internet browser's privacy and security settings. Do-Not Track Features (U.S. Residents only)**

Many web browsers and some mobile operating systems and mobile applications include a "do-not-track" feature or setting that you can activate to signal your preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing "do-not-track" signals has been finalized and, as such, we do not currently respond to "do-not-track" browser signals or similar mechanisms.

### **Auto-Fill**

We use technology to collect your browser's auto-fill information to identify registration errors or notify you if the registration cannot be submitted. You can disable this feature in your browser settings while still maintaining access to all options on our websites.

### **Email Marketing Communications**

You may opt out of receiving promotional marketing communications from us at any time by following the instructions at the bottom of your marketing communications to click on the "unsubscribe" link, or contact us using the methods in the "Contact Us" section below. If you opt out, we may still send you non-marketing communications, such as information about your purchase or lease.



## 5. DATA RETENTION

Except as listed below, we will retain your personal data for at least one year following our last commercial interaction with you unless otherwise prohibited by federal or state law. In no event shall we retain your personal data or sensitive personal data for the disclosed purpose for which it was collected for longer than is reasonably necessary to carry out that disclosed purpose.

When there is/are indication(s) of potential legal claim(s) or liability, the retention period will be extended accordingly.

When we have no ongoing legitimate business need to process your personal data, i.e. when we no longer have a legal basis in accordance with applicable law, we will either delete or anonymize it and will make such determination based on applicable laws. When the processing of personal data is based on your consent, the data will be stored for as long as there is valid consent for the processing.

## 6. U.S. PRIVACY NOTICE

### “Legal Categories” of Personal Data

Privacy laws require us to tell you about the personal data we collect about you in a certain way – specifically, we need to tie it back to “legal categories” of personal data that are listed in the law. To do this, we bundled up the information we gave you above in this Privacy Notice and matched the different types of personal data we collect about you with the legal category. Please note that certain pieces of personal data may fall into more than one of these categories.

To make things easier to understand, we have put this information in a table which outlines:

1. The legal category of personal data,
2. Examples of the types of personal data included in each legal category,
3. The source(s) from which we collect this type of personal data
4. The purpose(s) for why we collect and use your personal data for each legal category; and
5. The business purposes for which we share your personal data and with whom.
6. The information we disclose for business purposes. We have included these things in the **Privacy Chart** at the end of this Privacy Notice.

### Your Rights and Choices in the U.S.

For all personal data that we collect about you, you may have the following rights or choices that we will accommodate where your requests meet legal and regulatory requirements and do not risk making our other data less secure or changing our other data. You may also designate an authorized agent to make a request on your behalf.

- **Access and Know:** You may have the right to know what information is being collected about you, whether it is disclosed, and to whom. You may also request to know the categories of personal data collected about you, the information or categories of information shared with third parties, or the specific third parties or categories of third parties to which the information was shared; or, some combination of similar information. If you have questions about your information or would like to request that we provide a copy of your information to you, please contact us using the methods in the “Contact Us” section below.
- **Correct:** If you believe that any of your information collected by us is inaccurate, you may have the right to have that information corrected but not deleted, depending upon the nature of the personal data and the purpose for its processing.
- **Erase:** You have the right to request that we erase your information. In some cases, we may be required to retain your data if processing is still necessary. We will weigh your interest in having your personal data erased against the necessity of maintaining the personal data for our legitimate interests. To request the deletion of your data, please contact us using the methods in the “Contact Us” section below.
- **Opt Out of Sale, Sharing, Targeted Advertising, or Profiling:** You may have the right to ask us not to sell your personal data, or not to use it for targeted advertising or profiling.
- **Opt Out of Certain Processing:** You may have the right to restrict our ability to process personal data about you under certain circumstances.
- **Limit Use and Disclosure of Sensitive Personal Data:** You may have the right to direct us to limit our use of sensitive personal data to that use which is necessary to perform the services and which is reasonably expected by the average consumer requesting the services.
- **Right Against Automated Decision Making:** You may have the right not to be subject to a decision based solely on an automated process without human input.
- **Portability:** You may have the right to request personal data be disclosed in a common file format. If you would like us to send your personal data to another business or organization, please contact us using the methods in the “Contact Us” section below.
- **Appeal:** Where a controller declines to take action regarding your request to exercise any privacy right, you may be allowed to appeal the decision and provide instructions on how you may request an appeal.
- **Non-Discrimination:** You have the right not to receive discriminatory treatment by Swire because you exercise your privacy rights. If you have any questions, please contact us using the methods in the “Contact Us” section below.

*How to Make a Request:* If you would like to make a request, please contact us using the information in the “Contact Us” section of this Privacy Notice. Please include your name, email, phone number, state or country of residence, and the specific type of request you would like to make (a request to know, erase, correct, opt out of sale, portability, or access). We are not responsible for any losses that could arise from any inaccurate, deficient, or incomplete personal data that you provide.

For security reasons, we may need to request specific information from you to help us confirm your identity, before we correct, update, or delete any personal data.

*Responding to Requests:* Your request will be evaluated to determine whether the requested change meets legal regulatory requirements and does not risk making our other data less secure or changing our other data. If we aren’t able to honor any part of your request, we will tell you that in our response, as well as the reason(s) we cannot do so. You may have the right to appeal the decision.

*Verifying Your Identity:* To protect you and your information, we may ask you to confirm certain information before we honor your request. For example, if you make a request, we will ask you to confirm your email address and phone number. For certain requests, we will use a combination of your email address, phone number, and zip code to verify your identity, so that we can help protect your information. If you designate an authorized agent to make a request on your behalf, we may require you to verify your identity and provide the authorized agent’s identity and contact information to us.

*Authorized Agents:* You may have the right to designate someone else to make privacy requests for you under the data protection laws. Authorized agents must:

- Provide us with valid written authorization, that the third-party agent has the authority to act on behalf of the individual whom they are making the request, which must include the agent’s name, email address, and phone number,
- You must follow the instructions above to verify your own identity, and
- The authorized agent must follow the instructions provided in this section to make a request.

We reserve the right to verify the validity of any third-party request to exercise privacy rights on behalf of our customers to the fullest extent permitted under applicable data protection law.

*Appealing our Decision:* If you disagree with a decision we make regarding your request to exercise a privacy right as described in this policy, you may contact us using the "Contact Us" section below. Please refer to the prior request, and include the reason for your appeal in your request.

## **7. CALIFORNIA SHINE THE LIGHT NOTICE**

California residents have the following additional rights regarding disclosure of your personal data to third parties for their own direct marketing purposes:

We provide California residents with the option to opt-in to sharing of "Personal Data" as defined by California's "Shine the Light" law with third parties, other than with our affiliates, for such third parties' own direct marketing purposes. We do not share personal information with non-Affiliate third parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law and/or withdraw previously given consent to sharing with non-affiliate third parties for their direct marketing purposes by contacting using the methods in the "Contact Us" section below. Requests must include "California Marketing Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and zip code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the provided e-mail address or mailing address.

## **8. EUROPEAN PRIVACY NOTICE**

This section of our Privacy Notice applies to residents of the European Economic Area (EEA).

### **International Data Transfers**

Swire primarily stores the personal data we collect in the United States. To facilitate our global operations, our staff and/or our service providers may transfer and access such personal data from locations around the world, including outside the EEA.

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Notice. Whenever we transfer your personal data out of the EEA, we will ensure one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- We use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or
- We will ensure there is some other protection in place which has been approved by the European Commission as giving personal data the same protection it has in Europe.

### **Your Privacy Rights**

Under certain circumstances, individuals within the EEA have rights under data protection laws as set out below:

- **Request access** to your personal data, to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your information if it is inaccurate or incomplete.
- **Request erasure** of your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where you

believe we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or that of a third-party) and you feel it impacts your fundamental rights and freedoms. You also have the right to object to our processing of your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data if: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided for us to use or where we used the information to perform a contract with you.
- **Complain to a government regulator** if you are not satisfied with our response, depending on your location.

## 9. CHILDREN'S PRIVACY

Our websites and services are not intended for use by anyone under the age of thirteen (13). In accordance with the Children's Online Privacy Protection Act ("COPPA"), we do not knowingly request, collect, or solicit personal data from anyone under the age of thirteen (13). In the event that we receive actual knowledge that we have collected such personal information without the requisite and verifiable legal guardian consent, we will delete that information from our systems as quickly as is practical. We recommend that parents or legal guardians be involved in the online activities of their children to prevent the collection of their information without parental consent. We reserve the right to request proof of age at any stage so that we can verify that minors are not using the services. If you become aware that your child has provided personal data without your consent, please contact us using the methods in the "Contact Us" section below.

## 10. HOW WE PROTECT YOUR PERSONAL DATA

We are committed to implementing appropriate security measures to help safeguard your personal data from unauthorized access and disclosure. We use organizational safeguards such as restricted site access and technological safeguards such as encryption and firewalls.

While we cannot guarantee that loss, misuse, or alteration will never occur, we have implemented appropriate technical and organizational security measures designed to protect the security of any personal data we collect, receive, use, or store. These measures also apply to data transferred to different countries for use or processing in accordance with this Privacy Notice. We strive to protect your personal data taking into account the state of art, the cost of implementation and the

nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for your rights and freedoms posed by the processing.

Please keep in mind that no method of storage or transmission over the Internet is completely secure, so your use of our services and provision of information to us is at your own risk. We recommend accessing our websites within a secure environment. If you believe your account has been compromised or you suspect any type of data breach, please contact us using the methods in the "Contact Us" section below.

## **11. DE-IDENTIFIED (ANONYMIZED) AND AGGREGATE DATA**

Our websites may de-identify or anonymize and aggregate data for business purposes, including but not limited to, improving the products and features of our services, maintaining the security and integrity of our systems, for analytics, and other legitimate business purposes.

"De-identified Data" means information that cannot reasonably be used to infer information about, or otherwise be linked to a particular data subject. De-identified Data includes anonymized data and is no longer "personal data" under applicable data protection laws. When we process De-identified Data, we commit to maintain and use the information in de-identified form and not attempt to reidentify the information, except where permitted by law. The websites may disclose De-identified Data to third parties who commit themselves to maintaining the De-identified Data in anonymized form and not attempt to re-identify the data for any business purpose.

## **12. LINKS TO SOCIAL MEDIA AND THIRD-PARTY WEBSITES**

Our websites may contain links to other third-party sites on the Internet. The information practices of those websites are not covered by this Privacy Notice. We are not responsible for the privacy policies of other websites. You should carefully review any terms, conditions and policies of such third-party sites before visiting them or supplying them with any personal data. If you follow a link to any third-party site, any information you provide that site will be governed by its own terms of use and privacy policy and not this Privacy Notice.

We are not responsible for the privacy or security of any information you provide to a third-party website, or the information practices used by any third-party site, including links to any third-party site from the websites. We make no representations, express or implied, concerning the accuracy, privacy, safety, security or the information practices of any third-party site. The inclusion of a link to a third-party site on our website does not constitute any type of endorsement of the linked site by us. We are not responsible for any loss or damage you may sustain resulting from your use of any third-party website or any information you share with a third-party website.

## **13. WEBSITE TERMS OF USE**

The Website [Terms of Use](#) governing your use of the websites contains important provisions disclaiming and excluding our liability and the liability of others regarding your use of the websites and provisions determining the applicable law and exclusive jurisdiction for the resolution of any disputes regarding your use of the websites. Each of those provisions also applies to any disputes that may arise in relation to this policy and the collection, use and disclosure of your personal data, and are of the same force and effect as if they had been reproduced directly in this Privacy Notice.

#### **14. CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to modify or change this Privacy Notice at any time. When we make a material change to this Privacy Notice, we will inform you by changing the date on this page noting when the Privacy Notice was last updated. The collection, use, and disclosure of your personal data by us will be governed by the version of this Privacy Notice in effect at that time. Your continued use of the websites will signify that you consent to the collection, use, and disclosure of your personal data in accordance with the changed policy.

#### **15. CONTACT US**

For questions regarding this Privacy Notice or to submit any of the requests mentioned above, contact us by sending an email to [privacy@swireprops.com](mailto:privacy@swireprops.com) or writing to:

Swire Properties  
Attention: Data Privacy Officer  
98 SE 7th Street, Suite 500  
Miami, Florida 33131

T:(305) 371-3877

## 16. CALIFORNIA PERSONAL DATA CHART

This section summarizes how the websites process personal data in accordance with California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, "CCPA"). The terms used in this section shall have the same meanings as given to them under the CCPA.

In the last 12 months, we have collected or received, shared, or sold the following categories of Personal Data:

| Legal Category*   | Source(s)   | Purpose for Collection   | Categories of Third Parties to Whom we Disclosed for a Business Purpose  | Categories of Third Parties to Whom Data May be Disclosed                               |
|---|---|--|--|---|
| <b>A. Identifiers.</b><br><br>A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.  | <ul style="list-style-type: none"> <li>Directly from You</li> <li>Automatically from your Device</li> <li>From Third Parties</li> </ul> | <ul style="list-style-type: none"> <li>Communications</li> <li>On-Site Visits</li> <li>Complimentary Wi-Fi</li> <li>Websites</li> <li>Analytics</li> <li>Social Media</li> <li>Gift with Purchase</li> <li>Marketing</li> <li>Engagement</li> <li>Event Registration</li> <li>Purchase/Lease</li> <li>Secure our Systems and Networks</li> </ul> | <ul style="list-style-type: none"> <li>Affiliates, Subsidiaries and Locations</li> <li>Service Providers</li> <li>Compliance with Legal Obligations</li> <li>Changes in Business Structure/Ownership</li> </ul>  | <ul style="list-style-type: none"> <li>Advertisers</li> <li>Google Analytics</li> </ul> |
| <b>B. Personal data categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b><br><br>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, | <ul style="list-style-type: none"> <li>Directly from You</li> <li>From Third Parties</li> </ul>   | <ul style="list-style-type: none"> <li>Communications</li> <li>On-Site Visits</li> <li>Complimentary Wi-Fi</li> <li>Websites</li> <li>Analytics</li> <li>Social Media</li> <li>Gift with Purchase</li> <li>Marketing</li> <li>Engagement</li> </ul>  | <ul style="list-style-type: none"> <li>Affiliates, Subsidiaries, and Locations</li> <li>Service Providers</li> <li>Compliance with Legal Obligations</li> <li>Changes in Business Structure/Ownership</li> </ul> | <ul style="list-style-type: none"> <li></li> </ul>                                      |



|   |  |   |   |  |
|---|--|---|---|--|
| education, employment, employment history, marital status, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal data included in this category may overlap with other categories.  |  |   |   |  |
| <b>C. Protected classification characteristics under California or federal law.</b><br><br>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information). | <ul style="list-style-type: none"> <li>Directly From You</li> </ul>  | <ul style="list-style-type: none"> <li>On-Site Visits</li> <li>Marketing</li> </ul> | <ul style="list-style-type: none"> <li>Service Providers</li> <li>Marketing Recipients</li> </ul>   | <ul style="list-style-type: none"> <li></li> </ul> |
| <b>D. Commercial information.</b><br><br>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.   | <ul style="list-style-type: none"> <li>Directly From You</li> <li>Automatically from Your Browser or Device</li> </ul> | <ul style="list-style-type: none"> <li>Marketing</li> </ul>                         | <ul style="list-style-type: none"> <li>Affiliates, Subsidiaries, and Locations</li> <li>Service Providers</li> <li>Changes in Business Structure/Ownership</li> </ul> | <ul style="list-style-type: none"> <li></li> </ul> |
| <b>E. Biometric information.</b><br><br>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or  | Not Collected.   |   |   |  |

|  |  |  |   |   |
|--|--|--|---|---|
| identifying information, such as, DNA data, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. |  |  |   |   |
| <b>F. Internet or other similar network activity.</b><br><br>Browsing history, search history, information on interaction with a website, application, or advertisement.                       | <ul style="list-style-type: none"> <li>▪ Directly From You</li> <li>▪ Automatically from Your Browser or Device</li> <li>▪ From Third Parties</li> </ul> | <ul style="list-style-type: none"> <li>▪ Analytics</li> <li>▪ Marketing</li> <li>▪ Engagement</li> <li>▪ Websites</li> </ul>   | <ul style="list-style-type: none"> <li>▪ Affiliates, Subsidiaries, and Locations</li> <li>▪ Service Providers</li> <li>▪ Changes in Business Structure/Ownership</li> </ul> | <ul style="list-style-type: none"> <li>▪ Advertisers</li> <li>▪ Google Analytics</li> </ul> |
| <b>G. Geolocation data.</b><br><br>Data that can identify a consumer's physical location or movements.   | <ul style="list-style-type: none"> <li>▪ Automatically from Your Browser or Device</li> </ul>  | <ul style="list-style-type: none"> <li>▪ Analytics</li> <li>▪ Marketing</li> <li>▪ Engagement</li> <li>▪ Secure our Systems and Networks</li> <li>▪ Complimentary Wi-Fi</li> <li>▪ Websites</li> </ul> | <ul style="list-style-type: none"> <li>▪ Affiliates, Subsidiaries, and Locations</li> <li>▪ Service Providers</li> </ul>  | <ul style="list-style-type: none"> <li>▪ Advertisers</li> <li>▪ Google Analytics</li> </ul> |
| <b>H. Sensory data.</b><br><br>Audio, electronic, visual, olfactory, or similar information.   | <ul style="list-style-type: none"> <li>• Directly From You</li> </ul>  | <ul style="list-style-type: none"> <li>• Security</li> <li>• Analytics</li> <li>• Purchase/Lease</li> </ul>  | <ul style="list-style-type: none"> <li>• Affiliates, Subsidiaries, and Locations</li> <li>• Service Providers</li> </ul>  | <ul style="list-style-type: none"> <li>•</li> </ul>   |
| <b>I. Professional or employment-related information.</b><br><br>Current or past job history or performance evaluations.   | Not Collected.   |  |   |   |
| <b>J. Education information as defined by the Family Education Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).</b>   | Not Collected  |  |   |   |

|  |  |  |  |   |
|--|--|--|--|---|
| Information that is not publicly available maintained by an education agency or institution related directly to a student.   |  |  |  |   |
| <b>K. Inferences drawn from other personal data.</b><br><br>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.  | <ul style="list-style-type: none"> <li>Automatically from your devices</li> <li>From Third Parties</li> <li>Directly From You</li> </ul> | <ul style="list-style-type: none"> <li>Analytics</li> <li>Marketing</li> <li>Engagement</li> </ul> | <ul style="list-style-type: none"> <li>Affiliates, Subsidiaries, and Locations</li> <li>Service Providers</li> </ul> | <ul style="list-style-type: none"> <li>Advertisers</li> <li>Google Analytics</li> </ul> |
| <b>L. Sensitive personal data.</b><br><br>Personal data that reveals a consumer's: Social Security number, driver's license number, state identification card number, or passport number; a consumer's account log-in, financial account, debit card, or credit card number in combination with any security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a consumer's mail, email, and text messages (not business related); genetic data; biometric data used to uniquely identify a consumer; health data; or data related to sex life or sexual orientation. | <ul style="list-style-type: none"> <li>Directly From You</li> </ul>  | <ul style="list-style-type: none"> <li>Directly From You</li> </ul>                                | <ul style="list-style-type: none"> <li>Purchase/Lease</li> </ul>   | <ul style="list-style-type: none"> <li></li> </ul>                                      |

\*We may also collect your information to comply with laws or regulations or with legal requests that don't fit into one of the categories we've described for you, or to enforce our rights, prevent fraud, and protect our systems, users, and customers.