



PRIVACY AND DATA PROTECTION POLICY

Welcome to InvestaCrowd’s real estate crowd financing platform. This website is owned and operated by InvestaCrowd Limited., a British Virgin Islands company limited by shares (“InvestaCrowd”). To assist you in using our website and associated services, and to ensure a clear understanding of the relationship arising from your use of our website and participation in these services, we have created this Privacy and Data Protection Policy (“Privacy Policy” or “Policy”) and a terms of use (“Terms of Use” or “Terms”). These documents sets the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. The [Terms of Use](#) govern your use of our website. The Privacy Policy discloses which information we collect and how we use it, as well as the choices you can make about the way your information is collected and used. We also explain how any personal or personally identifiable information that we may request will be used. Furthermore, we detail our security policy, which describes how your personal information is protected. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By accessing or using our web site, including any subdomain and/or sub-directory thereof (the “Website” or “Site“), you signify that you have read, understand and agree to be bound by the terms of our Privacy Policy, as well as the [Terms of Use](#) , which is incorporated herein in its entirety, regardless of whether you are a registered member of the Site. The term “you” or “User” as used herein refers to any member, user or viewer of our Site, including any prospective investor or real estate developer, owner, agent, sponsor, operating company seeking funding for their real estate project (collectively, “Offering Companies”). This Privacy Policy is an agreement between you and InvestaCrowd, its subsidiaries and affiliated entities (collectively, “us”, “we” or “InvestaCrowd”) with regard to how information you provide to us through the Site is used and treated. Please read the Privacy Policy carefully before using the Site. **If you do not wish to be bound by the terms of our Privacy Policy, please do not access or register on our Site.**

InvestaCrowd values your privacy. The following describes policies and procedures on the collection, use and disclosure of personal data by InvestaCrowd when using the InvestaCrowd platform or any of the services and/or products provided through the Site (the “Services”). If you have questions or concerns regarding this statement, you should first contact us at support@investacrowd.com.

“Personal data” means any information in our possession or control, whether true to not, that relates to you to the extent that you may be identified or identifiable from that information or in combination with other information in our possession.



CHANGES TO PRIVACY POLICY

The content of the pages of this Site may change without notice from time to time, including but not limited to, this Privacy Policy. You understand and agree that your continued access or use of the Site after we have made any such changes constitutes your acceptance of the new Privacy Policy.

COLLECTION AND USE OF PERSONAL DATA

We collect personal and financial information from you while you use the Site; most of this collection occurs during registration. Most of the information collected is required for legal, compliance or security purposes, although some are optional. Certain additional personal information must be supplied during the investor registration process, such as home address, telephone number, country of citizenship, date of birth, gender.

In general we collect several types of information from you:

- Personal data required to verify your identity
- Personal and financial data necessary to assess your eligibility to invest on the InvestaCrowd platform, specifically, Users who are accredited investors will need to provide financial information supporting their accredited investor status
- Information about your visits to and use of this Website to help us maintain the appropriate features, functionality and user experience

To create an account with InvestaCrowd, you must provide your name and a valid email address. Users may also create an account using social media credentials as provided for on the Site, such as Facebook or LinkedIn. These services will authenticate your identity and provide you with the option to share certain personal data with us to pre-populate our sign up form. In doing so, Users consent to InvestaCrowd collecting personal data that may be available through such social media networks.

The personal data collected on the Site maybe used by InvestaCrowd for the following purposes:

- for the specific purpose for which the information was volunteered;
- to establish your ability to view offering materials and to make investments through the Site¹;

¹ U.S. investors must be “accredited investors” as that term is defined in Rule 501 of Regulation D of the Securities Act of 1933 and complete a further accreditation form. Singapore investors must either be (i) “accredited investors” as that term is defined in Section 4A(1) of the Securities and Futures Act, Chapter 2899 and complete a further accreditation form, or (ii) “qualified investors” who have completed the Know Your Customer form.



- to provide you with alerts, newsletters, education materials or information that you requested or signed up to;
- promoting and marketing services and products subject to your exercise of the opt-out right;
- to communicate with you and respond to your queries;
- to process your application, inquiry or request;
- to verify your identity, conduct Know Your Customer and other due diligence check as may be required;
- to guard against potential fraud and other illegal activities;
- to maintain regular communications with you as may be necessary to inform you of upcoming investment opportunities and other company updates;
- to conduct surveys, research and statistical analysis with the aim of helping us monitor or improve our Services to you;
- to comply with applicable laws, proceedings or inquiries from regulatory authorities and enforcement agencies in or outside of Singapore or similar purposes;
- for any other purposes permitted by applicable laws.

In addition, we gather names and email addresses of Users who contact us through the Site with questions about our company or our lending platform. We collect this information for the sole purpose of responding to such inquiries and do not store the contact information unless requested by these people, as in the case of job applicants who submit resumes.

[All personal information held by InvestaCrowd will be kept for seven years after the last transaction with the client.] We will retain your information for only as long as there is a business or legal need.

HOW WE SHARE YOUR INFORMATION

InvestaCrowd does not sell or rent personal information about its Users to third parties. We do, however, work with a number of trusted partners who perform vital functions as part of our operations.

In addition to Katapult, a services and software company, we work with (among others) providers of hosting services for the Site, electronic signature providers, and electronic payment service providers. We may engage third parties to help us to carry out certain other internal functions such as account processing, client services or other data collection relevant to our business; examples of such companies might include companies that perform data processing, reporting, tax or legal documentation, custody or escrow services. Personal data is shared with these third parties, including Offering Companies, only to the extent necessary for us to process the transactions you initiate or perform



other specific services, like collections. Our partners are legally required to keep your information private and secure.

If you use our blog or other public forums on the Site, you should be aware that any personally identifiable information you submit there can be read, collected, or used by other Users of this forum, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in this forum. We may share your personal data with law enforcement or other government agencies as required by law or for the purposes of limiting fraud. We reserve the right to disclose your personally identifiable information when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order or legal process. We further reserve the right to disclose any of your personal information that we believe, in good faith, appropriate or necessary to take precautions against liability, to investigate and defend against any third party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Site or our Services, or to protect the rights, property or personal safety of InvestaCrowd, its Users, Offering Companies, or any other person.

WEB-RELATED INFORMATION COLLECTION

When you visit the Site, whether or not you register for an account, we may send one or more cookies – small text files containing a string of alphanumeric characters – to your computer. “Cookies” are small text files that may be placed on your web browser when you visit our Site that may convey anonymous information about your preferences and how you browse the Site to us, but does not collection personal data about you. We use cookies when you sign in, to keep track of your personal session, including some account identifiers so that we can ensure that you are the only person making changes to your account. We also use cookies to track your activity on the Site as a unique person. All of this information is stored in an encrypted fashion for security reasons, and no personal information about you is stored. You can set your web browser to inform you when cookies are set or to prevent cookies from being set. Please note, however, that if you decline to use cookies, you may experience reduced functionality and slower Site response times; your declining to use our authentication-related cookies may prevent you from using the Site altogether.

Our website uses Google Analytics, a web traffic analysis service provided by Google Inc. (“Google”). Please refer to <http://www.google.com/policies/privacy/partners> to find out more about how Google uses data when you use our website and how to control the information sent to Google. Furthermore, you can prevent Google’s collection and processing of data by using the Google Ads Settings page or downloading and installing their browser plug-in (<https://tools.google.com/dlpage/gaoptout>).



In addition, we (or our service providers, such as Google Analytics) may also collect web surfing data related to your use of the Services. This may include, for example, information regarding which of our web pages you access, the frequency of such access, and your product and service preferences. This data collection may be accomplished by using cookies, web beacons, page tags or similar tools that are set when you visit the Website. Such web surfing data may include your Internet Protocol (IP) address, browser type, internet service provider (ISP), referring or exit pages, click stream data, operating system and the dates and times that you visit the Website. Web surfing data and similar information may be used for administrative purposes, to assess the usage, value and performance of our online products and services, and to improve your experience with the Service. As with cookies, the web surfing information collected is aggregated, anonymous "click stream" and transactional data, and is not associated with any Users as individuals.

NOTIFICATIONS AND COMMUNICATIONS FROM OUR SITE

We will send you email notifications from time to time. Such notifications are required elements of your transactions on our platform, such as confirmations of particular actions you have taken. These required notices are sent typically to notify you of a change in status such as when you are confirmed as an investor, or for legal or security purposes. For example, certain notifications are sent for your own protection to ensure that another person cannot make a change to your account without your knowledge. In other cases, these notifications involve changes to various legal agreements or Site policies. Generally, you may not opt out of such service-related emails.

From time to time, we may also send user surveys, requests for user feedback regarding user experience and Site operations or marketing offers from us or on behalf of the Offering Companies. The completion of these surveys or requests for feedback or acceptance of any offer is strictly voluntary. If you do not wish to receive these offers, surveys or user feedback emails, please opt out in any offer email you receive from us.

LINKS TO OTHER SITES

The Site may contain links to other web sites which are not maintained by InvestaCrowd. If you follow any links that direct you away from the Site, this Privacy Policy will not apply to your activity on the other websites you visit. We do not control the privacy policies or the privacy practices of any third parties.

TRANSFERRING INFORMATION OVERSEAS

Personal data collected through this Site may be stored and processed outside of Singapore or any other country in which InvestaCrowd or its agents maintain offices. By



providing your personal data and using the Site, you consent to any such transfer of information outside of your country. Your personal data may be transferred to, and stored at, any country in compliance with local hosting requirements, including countries which may not have as robust a data protection regime, to achieve any of the purposes stated above and for systems administration.

If you submit any personal information relating to another person on or through the Site to InvestaCrowd and such personal information is protected by another state or country, you will be responsible for compliance with the applicable laws in so far as they relate to your right to use such personal information, your transfer of it to InvestaCrowd, InvestaCrowd's storage of that personal information in electronic form on the Site and collection, use, processing and transfer of that personal information in accordance with this Privacy Policy.

SECURITY POLICY

We limit access to the personal information we have about you to those employees or third parties who have a legitimate business need to access such information. In keeping with industry standards and practices, we maintain appropriate physical, electronic and procedural safeguards and controls to protect your information, including partnerships with Amazon Web Services allowing us to rely on ISO 27001 security certification and extended validation SSL Plus certificate provided by Digicert. The Site is built upon a secure infrastructure with multiple layers of protection and we use industry standard encryption technologies to safeguard your information.

We cannot, however, warrant or guarantee that the information you provide to InvestaCrowd or transmit through the Site will not be accessed, disclosed, altered or destroyed by breach of any of our procedural safeguards and controls. In the event that personal data is compromised as a result of breach of security, InvestaCrowd will promptly notify those persons whose personal data have been compromised. You agree not to hold InvestaCrowd liable for disclosure of any such information or other information that is due to any such breach of security or any other circumstances beyond the control of InvestaCrowd,

You can take several precautions to protect the security of your computer and personal information. For instance, you can use a well-chosen password, and restrict access to your email account. You can also install and regularly update antivirus and firewall software to protect your computer from external attacks by malicious users. When you are finished with a session on the Site, be sure that you log out and close the browser window.



You should also be aware of fraudulent attempts to gain access to your account information known as "phishing," whereby scammers try to bring unsuspecting people to a website by using a genuine-looking email purporting to be from a legitimate company. Sometimes, either in the email itself or on this fake site, scammers will ask for login information to gain access to people's accounts and withdraw their money.

InvestaCrowd will never send you an email asking you for your login information. In general, you can protect yourself against phishing by never providing personal or login information via a link contained in an email; instead, go to the website directly. You might also make it a habit to check the URL of a website to be sure that it begins with the correct domain. In the case of InvestaCrowd, you should always ensure the URL begins with <https://investacrowd.com> or <https://www.investacrowd.com>

GENERAL CONSENT

By giving or making available your personal data, you expressly agree and consent to the collection, use, processing and disclosure of your personal data in accordance with the terms of this Privacy Policy, including but not limited to, consenting and receiving communications and materials from us, from time to time.

Questions? Please email us at support@investacrowd.com

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