

PRIVACY POLICY. Updated: May 2020

Grosvenor Americas (referred to herein as **Wheelhouse**, “we” or “us”) is committed to protecting the privacy of the users of its website. This statement discloses our privacy practices. The purpose of this statement is to inform you:

What kinds of information we collect from users of **wheelhousefairoaks.com** and how the information is used by us; whether we disclose any user information to third parties; how you can access, update or delete any information that we collect about you; and the security procedures in which we use to protect your personal information.

By using **wheelhousefairoaks.com**, you are agreeing to the **Wheelhouse** Privacy Policy. We reserve the right to change, modify, add, or remove portions of our Privacy Policy at any time. Please check this page periodically for changes.

If you have any questions about our Privacy Policy, please email us at **wheelhouse@thrivecommunities.com**.

HOW WE COLLECT INFORMATION

You can visit **wheelhousefairoaks.com** without revealing any personal information. Our web servers collect the Internet Protocol addresses, but not the email addresses, of visitors. This information can measure the number of visits, average time spent on the site, pages viewed and other such statistics.

In addition, you may be asked for information that identifies you, including your name, email address, mailing address, zip code, telephone number, fax (collectively, “Personal Information”). You may also elect to provide such information to us by sending or responding to emails regarding certain listings or services offered on our website.

HOW WE USE AND DISCLOSE YOUR INFORMATION

We collect, generate, retain and use your Personal Information for our own internal purposes in connection with the facilitation, recording and processing of any requests, communications, or interactions you may have with our Website. We also automatically collect and store statistics and other information about you and your online activities on an aggregated, non-personally identifiable basis and in a manner, that may allow us or our affiliated or related entities to improve our services to you.

In addition, your Personal Information may be also be used by us to provide you with information regarding our products and services. For example, we may use your email address to send you special announcements and notifications of new real estate listings, services or promotions that may be of interest to you.

COOKIES

Cookies allow websites to recognize you when you return and can keep track of information specific to you. Consistent with standard practices in the Internet industry, you may occasionally receive cookies from third parties to which you link from our Website. If you prefer, you may set your browser to ask for your permission before you receive a cookie. We do not control these third-party cookies, and they are not subject to this Privacy Policy.

INFORMATION SHARING AND DISCLOSURE

When you request information, we need to know your name, email address, and mailing address. This allows us to process and fulfill your request. **Wheelhousefairoaks.com** does not sell, trade, or rent your personal information to others. **Wheelhousefairoaks.com** may provide aggregate statistics

about our customers, sales, traffic patterns, and related site information to reputable third-party vendors, but these statistics will include no personally identifying information.

DATA SECURITY

Data security is critical to us and thus all Personal Information is held in a secured database. While it is impossible to guarantee the complete security of any computer system and the data contained therein, our vendors are required to maintain and implement robust security policies and procedures that combine with available technologies in accordance with prevailing industry standards, all of which are designed to protect the confidentiality, integrity, and availability of your Personal Information. To the extent we are provided with social security numbers or personal financial information, we comply with all applicable regulations regarding the confidentiality and safe disposal of such information.

ACCESSING, UPDATING OR DELETING INFORMATION COLLECTED ABOUT YOU BY **WHEELHOUSEFAIROAKS.COM**

If you wish to access, update, or delete contact information or preferences, please send an email to **wheelhouse@thrivecommunities.com**. Please be aware, however, that we cannot always ensure that such corrections or deletions will immediately be made in our database.

CALIFORNIA CONSUMER PRIVACY ACT (CCPA)

If you are a California resident, you have the following rights under the CCPA:

- The right to know what personal information has been collected, where it is sourced from, what it is used for, whether it is being disclosed and sold, and to whom.
- The right to “opt out” of the sale of your personal information to a third party.
- The right to request access to and deletion of your personal information (with certain exceptions, such as in order for us to: complete a business transaction with you, detect and protect against fraud or illegal activity, exercise our rights, or comply with our legal obligations).
- The right to receive equal service and pricing even if you exercise your rights under the CCPA.

The personal information that is collected, and its sources and uses, is more fully described above. It includes personal information from the following categories: identifiers/contact information, device and online identifiers, internet or other electronic network activity information, and inferences drawn from the above. **Wheelhouse** does not sell your personal information to third parties, and only shares aggregated information as described in this Policy.

If you have additional questions or requests related to your rights under the CCPA, please send an email to **wheelhouse@thrivecommunities.com**.

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