

Introduction

This Privacy Notice (“Privacy Notice”) applies to Cottonwood 1031 Properties’ website accessible at <https://www.cottonwood1031.com> (“Website”). This Privacy Notice describes how Cottonwood 1031 Properties collects and uses personal information collected through the Site. It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information.

1. Personal Data We Collect

Cottonwood 1031 Properties collects data from you, through our interactions with you and through our Site. You provide some of this data directly, and we get some of it by collecting data about your interactions, use, and experiences with our Site. The data we collect depends on the context of your interactions with us and the choices you make, including your privacy settings and the services and features you use. We also obtain data about you from third parties.

You have choices when it comes to the technology you use and the data you share. When we ask you to provide personal data, you can decline. Many of our services require some personal data to provide you with that service. If you choose not to provide data required to provide you with a service or particular feature, you cannot use that service or feature. Where providing the data is optional, and you choose not to share personal data, features like personalization that use such data will not work for you.

- Data you provide to us: This is personal information about you that you give us directly when you interact with us. You may give it to us by filling out a form on our Site, by corresponding with us by phone, e-mail, or at an in-person event, or through interactions in a Cottonwood 1031 Properties sponsored forum. It includes information necessary to register or pay for a subscription or event, to complete your profile, or to place an order for other services we provide. It also includes information shared when you participate in a discussion board, share on social media via our Site, enter a competition or promotion, submit a query, report feedback about or a problem within our Site.
- Data we collect about you from your use of our Site: We will automatically collect information from you each time you visit our Site whether or not you enter the Site as a registered user. This includes technical information, information about your visit, and information about your activity on our Site such as courses searched and viewed, page response times, download errors, length of visit to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), methods to browse to and away from a page, and methods used to contact our sales and support teams. Technical information may also include the internet protocol (IP) address used to connect your device to the internet, unique device identifiers, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating systems, and device platform.
- Data we receive from other sources: This is information we receive about you from third parties that we work closely with to provide, promote, and improve our services. These third parties include business partners, vendors who assist in technical and payment services, advertising networks, analytics providers, and search information providers.

2. How We Use Your Personal Data

Cottonwood 1031 Properties uses the personal information you provide in a manner that is consistent with this Privacy Notice as follows:

- Improvement of Services and Features: We use data to continually improve our Site, including by way of the addition of new content, features, or capabilities.
- Personalization: We use data to enhance the user experience based on prior interactions with our Site.
- Support: We use your personal data to respond to your requests for assistance.
- Communications: We will use your personal data to communicate with you.
- Marketing: We may use your personal data to provide you with information about our services that we feel may interest you and enhance your interaction with our Site. We will communicate with you about these goods and services via email, direct mail, telephone, or through our Site. These communications may include newsletters, promotional emails, or offers to participate in market research requests. We will use your information for this purpose only where you have given your consent to receive such marketing material from us at the point we collect your information, or where you have otherwise consented to receive such marketing material including by way of your selection of marketing preferences in your individual profile, and in accordance with local law.
- Prize Promotions and Events: We will use your data to administer prize promotions and events where you have consented to participate. For example, we may provide your contact information to a third party that would issue a gift card or other prize.
- Reporting and Business Operations: We will use personal data in our legitimate interests (where we have considered that such interests do not override your individual rights), to administer our Site, and for internal operations, including troubleshooting, data analysis, testing, research, statistical survey purposes, and reporting on our performance. We will also use this data for measuring the effectiveness of how we present content and for assessing the effectiveness of content. We use internet protocol (IP) addresses and non-personally identifiable information in our log files to analyze trends, to administer our Site, to track users' movements in and around our Site, and to gather demographic information about our user base as a whole. We also utilize unstructured machine learning technologies to understand user behaviors in order to provide user-specific recommendations and other personalization of our Site experience.
- Legal Compliance: We process personal data to comply with various laws. For example, we may process your personal data to assist you with exercising your individual privacy rights or to report any prizes or awards to an applicable taxing authority.

3. Reasons We Share Personal Data

We will take reasonable steps to ensure that we only disclose that personal data that is relevant for the purposes for which it is to be used. Furthermore, we will not process your personal data in a way that is incompatible with these purposes.

- Engagement with Cottonwood 1031 Properties Suppliers: We sometimes retain third parties to perform certain business-related functions such as sending email on our behalf, payment processing, or conducting market research. We also share your email address with third parties such as Facebook, LinkedIn, and Twitter in order to provide custom marketing materials for you on their platforms. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function. These third parties are not permitted to use your personal information that we share with them for any purpose other than as required for them to provide services to us.

- Corporate Mergers and Acquisition Activity: In the event that Cottonwood1031 Properties or its affiliates acquires or is acquired by another business operation, or in the event of a reorganization, merger, or other similar event, your personal data will be shared with the acquiring, acquired, or resulting entities and their affiliates including for the purposes of operating and managing your account as well as for providing you with additional products and services offered by the acquiring, acquired, or resulting entities.
- Legal Requirements: In certain situations, Cottonwood 1031 Properties may be required to disclose personal data in response to lawful requests by governmental agencies and supervisory authorities, including to meet security or law enforcement requirements. We reserve the right to disclose your personal information as required by applicable law and when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or similar legal process served on us or our Site.

4. How to Access and Control Your Personal Data

You can also make choices about the collection and use of your data by Cottonwood 1031 Properties. You can control your personal data that we have obtained, and exercise your data protection rights by contacting us or using features we provide. In some cases, your ability to access or control your personal data will be limited, as required or permitted by applicable law or your employer or group sponsor (where applicable.).

Control the use of your data for interest-based advertising via the following:

- Utilize the “Unsubscribe” link found in the emails we may send to you; or
- Contact us at team@cottonwood1031.com. Before helping you with your inquiry, we may ask to verify your identity or the identity of your authorized agent.

Not all personal data processed by Cottonwood 1031 Properties can be accessed or controlled via the methods above. Additionally, any personal data that you provide to third parties directly, such as our third party payment and subscription providers, can only be controlled directly by contacting such parties.

5. Cookies and Similar Technologies

Cottonwood 1031 Properties and its affiliates use cookies or similar technologies to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies allow us to create a unique device ID, enable you to be remembered when using that computer or device to interact with websites and online services, and can be used to manage a range of features and content, including storing searches and presenting personalized content.

The Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a feature rich and personalized user experience when you interact with our Site and also allows us to improve our Site. Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. We provide you with information about how to disable cookies in the table below. However, you may not be able to take full advantage of our Site if you do so.

A number of cookies we use last only while you are on our Site and expire when you close your browser or exit our Site. Others are used to remember you when you return to our Site and will remain for a longer period of time. We use these cookies on the basis that they are necessary for the performance of a contract with you, because using them is in our legitimate interests (where we have considered that such interests do not override your individual rights), or where required by law.

We use the following types of cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website and under our terms with you. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart, or make use of e-billing services.
- Analytical/performance cookies. These cookies allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us for our legitimate interests of improving the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognize you when you return to our website. This enables us, subject to your choices and preferences, to personalize our content, greet you by name, and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited, and the links you have followed. We will use this information subject to your choices and preferences to make our Site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Disabling Cookies

The effect of disabling cookies depends on which cookies you disable but, in general, our Site may not operate properly if all cookies are switched off.

If you want to disable cookies on our Site, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

- For Google Chrome:
 1. Choose Settings> Advanced
 2. Under “Privacy and security,” click “Content settings”
 3. Click “Cookies”
- For Safari:
 1. Choose Preferences > Privacy
 2. Click on “Remove all Website Data”
- For Mozilla Firefox:
 1. Choose the menu “Tools” then “Options”
 2. Click on the icon “Privacy”
 3. Find the menu “Cookie” and select the relevant options

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on our Site.

6. Security of Personal Data

Cottonwood 1031 Properties is committed to protecting the security of your personal data.

7. Enforcement and Dispute Resolution

We will conduct compliance audits of our relevant privacy practices to verify compliance with this Privacy Notice. Where any Cottonwood 1031 Properties employee has acted in violation of this Privacy Notice, as determined by us, the employee will be subject to disciplinary action up to and including termination of employment.

Any questions or concerns regarding our use or disclosure of personal data should be addressed to Customer Support at team@cottonwood1031.com. We will investigate and attempt to resolve any complaints and disputes regarding the use and disclosure of personal information in accordance with the provisions of this Privacy Notice.

8. Retention of Personal Data

Generally we will keep your personal data for the duration of our relationship with you. After our relationship ends, we will retain your personal information for a period of time that permits us to satisfy the following purposes: record retention as may be required by applicable law; for use in a legal claim or proceeding; to address any complaints regarding our services or the Website; or other legitimate interests (where we have considered that such interests do not override your individual rights.)

9. Changes to this Privacy Notice

We update this Privacy Notice when necessary to provide greater transparency or in response to:

- Feedback from customer, regulators, industry, or other stakeholders.
- Changes in our products.
- Changes in our data processing activities or policies.

When we post changes to this policy, we will provide a version and effective date for the most recent terms. If there are material changes to the policy, such as a change to the purposes of processing of personal data that is not consistent with the purpose for which it was originally collected, we will notify you either by prominently posting a notice of such changes on our Site before they take effect. We encourage you to periodically review this Privacy Notice to learn how Cottonwood 1031 Properties is protecting your information. If you do not agree to abide by this or any future version of the Privacy Notice, you do not have permission to use or access (or continue to use or access) our Site.

10. How to Contact Us

Questions or comments regarding this Privacy Notice should be submitted to Cottonwood 1031 Properties by e-mail as follows:

Email: team@cottonwood1031.com

[END OF PRIVACY NOTICE]

