

TERRA HOLDINGS, LLC

PRIVACY POLICY

The Terra Holdings, LLC group of affiliated companies, including the Brown Harris Stevens brokerage companies, operating as individually licensed companies in New York, Connecticut, New Jersey and Florida, Brown Harris Stevens Residential Management, LLC, and Halstead Management Company, LLC (collectively referred to herein as the **“Company,” “we” or “us”**) are committed to protecting the privacy of personal information we collect and the users of our services and our websites, including www.bhsusa.com, www.bhsmanagement.com, www.halsteadmanagement.com and any other websites owned and/or controlled by the Company or its affiliates (collectively, the **“Website”**).

Residents of California: Please review our California Notice at Collection and Privacy Policy

Scope of Policy

This statement discloses how we collect, use, and disclose personal information collected through our Website and other business services, products, and technology, including emails, texts, electronic communications, applications (the **“Services”**). Different Websites collect different personal information and use different collection and sharing techniques; our brokerage and management Companies provide different Services and collect different information; however the purpose of this statement is to inform you generally of:

- What kinds of information we collect;
- How such information is collected;
- How we use the information;
- How we use third party vendors and other third parties who may have access to information through our Website or your use of the Services; and
- How you may have the right to access, obtain copies of, update, and/or delete any personal information we collect or opt out from our communications or certain uses or disclosures of your personal information.

By using the Website and Services, you signify your assent to this Privacy Policy. We reserve the right to change, modify, add, or remove portions of our Privacy Policy at any time. If so, any such changes will be posted on this page. Please check this page periodically for changes. Your continued use of this Website and our Services following the posting of changes to the Company Privacy Policy will mean you accept those changes.

This Privacy Policy does not apply to third parties that we do not own or control that may provide Services or to third party websites that may link to or be accessible through our Website or use of our Services. It does not apply to information collected offline or to information collected by our independent contractors/ real estate agents outside of our Website. Our Website is intended for customers and residents of US properties and is not intended for children under the age of 18. If you believe we have collected information about an underage child, please contact us and we will delete it. If you have any questions about our Privacy Policy, please e-mail us at privacy@terraholdings.com.

Types of Information Collected and How Information is Collected

Generally, we collect:

- Information you provide by visiting our Website or using our Services, your correspondence with us, information provided when you complete forms and registrations, and other interactions. This

information may contain personal information, including sensitive personal information such as contact information, personal identifiers such as social security numbers (SSNs), passport information, dates of birth (DOB), financial information including account information, work, family and educational history information, biometric information, and video/audio information (from electronic communication sources and surveillance devices), all of which are “PII” ;

- Information about your internet and mobile connections, devices, IP addresses, equipment, and use;
- Information about your searches and preferences;
- Information from our third party business partners; and
- Information from automatic data collection technologies, including information about your use of the Services and information about your computer, internet devices and connections.

Automatic Data Collection Technologies

- We may use tracking technologies to collect information about your online activities across our Website and other online locations. This data, along with statistics and other information we automatically gather, helps us improve the Website and our Services, may be used in connection with our advertising and marketing activities.
- To do this, we may use:
 - **Cookies**, which are text files stored in your computer, to make it easier for you to navigate our Services, store your passwords, etc. You may set your browser to refuse cookies, but it may affect your ability to access some of our Services.
 - **Web Beacons**, which are web files (gifs or pixel tags) that permit us to gather statistics about visitors, emails that are opened, etc.
 - **Flash Cookies**, which collect information about your preferences and navigation to and from the Website.

Third Party Sites and Data Collection

- We may obtain information from third parties, such as advertisers, and third party providers of services, servers, content, and internet services. They may use Cookies, Web Beacons or other technologies. They may provide you with advertising or other content.
- Other third parties, such as bill payment services, payroll services, sale and leasing application packagers, and others may collect your personal information in the process of assisting us in providing Services to you, whether as a customer, employee, agent or resident in a managed building. Attached is a list of our third party vendor privacy policies and you should review their websites for more information.
- We may also receive information from other third party providers such as Google, Facebook, Zillow (StreetEasy) and others. We use Google Analytics to improve our Website and Services. For information on how Google uses information from sites that use their services, go to www.google.com/policies/privacy/partners/. Some sources, like www.google.com/analytics and www.facebook.com/about/privacy enable you to exercise choice about tracking online behavior.
- If you use a third party's services or go from our Website to a third party's website, we do not control those services or sites. Our privacy policy and other policies do not apply, and you are subject to the third party site's privacy policy, terms and conditions, and other provisions. Please make sure you review them.

Use of Information

- We retain and use your personal information and other information you provide for our own internal purposes in connection with facilitating, documenting, and processing inquiries,

requests, and interactions with our Website, and to fulfil any other purpose for which you provide the information and to fulfill our obligations when you use our Services.

- We use your personal information to perform our management and brokerage duties, including reporting, processing, payments, and notifications.
- **We do not sell your personal information to third parties, nor do we create profiles that are used for employment or housing approval purposes.**
- We also use information from both our own and third-party sources to improve our Services, by storing preferences, speeding up searches, and recognizing you when you return to our Website.
- We use information to do research, develop new processes and services, to fulfill our obligations, and satisfy legal requirements.
- In addition, your information may be used to provide updates about our products, Services, and promotions, as well as to fulfill our contractual and legal obligations to clients, such as sellers, buyers, landlords, tenants, managed buildings, and others. We may use your e-mail or text address to send you special announcements and notifications of new real estate listings or offers that may be of interest to you.

Information Sharing and Disclosure

We share information in the circumstances described below:

- **AGENTS-** We may share your information with our team of Company brokers and agents, who may use this information to contact you about our brokerage services.
- **AFFILIATES-** We may provide information to our affiliated businesses, including Vanderbilt Appraisal, Vanderbilt Insurance, and our management and sales divisions, to the extent their services may be useful to you and that information, on an aggregated basis, may be useful to improve their activities.
- **BUSINESS TRANSFERS-** If any part or all of our business is sold, we may have to provide information to the purchaser in order that they may continue to provide Services to you. Any such transfer is subject to all applicable laws and governmental regulations regarding the transfer and sale of such data.
- **THIRD PARTY ENTITIES-** We work with third party vendors, partners, and service providers and may combine their data with our data to provide better Services, products, and experience to our clients and agents. To the extent necessary in providing our Services, fulfilling our obligations to you and our clients, or responding to your requests, we share your information with such third party entities to help us provide the Services. We may also share data with third parties for business purposes, including without limitation cyber security, fraud prevention, bill collection, contract enforcement, distribution, financial, accounting, and legal purposes.
- **LEGAL OBLIGATIONS-** We release information when necessary to comply with any law, regulation, legal process, governmental request, or reporting obligation. We share information to comply with MLS/RLS listing requirements; to enforce our Terms and Conditions of Use and this Privacy Policy; and to protect the rights, property, or safety of the Company, our clients and customers and the public. Information will be shared with governmental entities, professionals, and others as required by our legal and contractual obligations.
- **COMMUNICATIONS-** By providing us with contact information, you consent to communications, electronically or otherwise, from us and our Agents regarding our Services. We may share your contact information with our client landlords, property owners, buyers, sellers,

and others, who may contact you to the extent necessary to satisfy their obligations to you or engage in communications in connection to your request for real estate services.

Artificial Intelligence

Artificial intelligence (AI) is of growing use in all businesses. The Company believes that AI should be used to speed and improve its responses in accordance with applicable law, but remains dedicated to providing the most professional available human staff and agents to satisfy its client and customer needs. *The Company does not provide create profiles for automated decision making.*

Accessing, Updating or Deleting Information and Opt-Out Instructions

- If you wish to **access, update, or delete contact information or preferences**, please send an email to privacy@terraholdings.com. Any deletions are subject to our legal obligations. We cannot always ensure that such corrections or deletions will be made in our database, that our Agents will delete all information, and that you will cease receiving all communications but we will endeavor to comply and will satisfy all legal obligations.
- If you do not want to receive promotional emails, you can click the unsubscribe button in any email.
- You may set your browser to block cookies or alert you when cookies are sent. We will honor the Do Not Track signal from your browser, and the Global Privacy Control opt-out, but this may adversely affect your experience of the Website or ability to receive Services.
- We cannot control third parties sending you advertising, but they may offer their own opt-out options. The Network Advertising Initiative also has information on how to block advertisements from their members on their website: <https://optout.networkadvertising.org/>.
- Residents of certain US states may have additional rights under applicable privacy laws. These rights may include:
 - Right to request personal information collected about them
 - Right to request deletion or correction of personal information
 - Right to request access to their personal information in a portable format
 - Right to opt out of sharing personal information with third parties
 - Right to appeal a business's refusal to take action on a request.

You may submit a request to exercise your state specific privacy rights by contacting privacy@terraholdings.com. Please provide evidence of your residency in the applicable state. If you are using an agent to make your request, you must verify your identity and provide written proof of authorization.

- For residents outside of the United State, your country's laws, including those of the European Economic Area, the United Kingdom, and Switzerland, may provide additional protections. If you have any concerns, please contact us at privacy@terraholdings.com and we will consider any additional requests.

Data Security

We endeavor to keep your information safe and employ industry standard security measures to prevent unauthorized access, use, and transmittal. We comply with all applicable federal, state, and local laws and regulations regarding PII data security and safe data PII disposal practices. However, we cannot guarantee that any data is entirely safe, and that equipment or software failure, or unauthorized access to or acquisition of PII, will not occur. Every user must take care to protect the user's equipment and passwords, and to promptly sign on and off from the Website and Services. Company has no liability for

data security incidents whether involving information we, our Agents, or our third party providers maintain, or which result from your use of third party services. No transmission or storage of information, especially PII, on the internet or through the Website can be guaranteed secure and users must take care in transmitting any PII.

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Terra Holdings Human Resources Third Party Vendor Privacy Policies

ADP – Payroll – HR – Onboarding – for corporate and clients and Benefits for Client Accounts

<https://www.adp.com/-/media/adp/redesign2018/pdf/data-privacy/public-global-privacy-policy2.pdf?rev=c5ae2b8eca134978b10265e0c369d97d&hash=5903551E10D9386D0FF8E44C40757A21>

BRI – FSA, Transit and COBRA (includes Transit accounts for corporate and client accounts)

<https://www.benefitresource.com/privacy-policy/>

Bswift – Benefit Site for corporate only

<https://www.bswift.com/privacy-policy/>

Carrot – Fertility Benefits for corporate only

<https://www.get-carrot.com/privacy-policy>

Decisely – medical benefits portal for corporate only

<https://decisely.com/decisely-privacy-policy/#::~:~:text=Decisely%20does%20not%20rent%20or.benefits%20through%20our%20online%20system>

EPIC – Benefits broker (they have access to all benefits information for corporate only)

<https://www.epicbrokers.com/edgewood-privacy/>

EyeMed – vision carrier for corporate only

<https://www.eyemed.com/en-us/online-privacy-policy>

Guardian – dental carrier as of 1/1/26 for corporate only

<https://www.guardianlife.com/privacy-policy>

HireRight – Pre-employment screening vendor for corporate and client accounts

<https://www.hireright.com/legal/us-candidate-policy>

MetLife – dental provider through 12/31 25 for corporate

<https://www.metlife.com/about-us/privacy-policy/us-consumer/>

Principal – 401(k) Provider for corporate and client plans

<https://www.principal.com/full-privacy-policy>

Prudential - Life, STD, LTD and leave management for corporate employees

<https://www.prudential.com/links/privacy-policy>

ShelterPoint – DBL carrier for client accounts

<https://www.shelterpoint.com/corporate/privacypolicy.aspx>

Standard Security – DBL carrier for client accounts

<https://www.sslicny.com/PrivacyPolicy>

The Hartford – DBL carrier for client accounts

<https://www.thehartford.com/online-privacy-policy>

SC Strategic Solutions (Shoreline) – document storage

<https://www.myscvview.com/policy.html>

Workable – employment search portal

<https://www.workable.com/privacy>

Chubb – Workers compensation carrier

<https://www.chubb.com/uk-en/footer/privacy-policy.html>

New York State Insurance Fund – workers compensation carrier for client accounts

<https://ww3.nysif.com/Home/FooterPages/Column2/PrivacyPolicy>

RAL Services – broker for DBL policies for client accounts

<https://www.ralservices.com/#::~:~:text=Our%20state%2Dof%2Dthe%2Dcountry's%20top%20insurance%20companies.%E2%80%8B>

NWPS - Agents' Retirement Plan

<https://www.nwpsbenefits.com/privacy-policy/>

RBC Wealth Management 3(21) Investment Advisor

<https://us.rbcwealthmanagement.com/retirementplanadvisors/>

The Wilshinsky Group – Morgan Stanley – 401(k) Invest Advisor

<https://www.morganstanley.com/disclosures/us-privacy-policy-and-notice>

Orenda Retirement – ERISA 3(16) Administrator for Client 401(k) Accounts

<https://orendaretirement.com/>

Key Client Investment Advisors, LLC – ERISA 3(38) Investment Advisor for Client Retirement Plans

<https://www.keyclientfa.net/>

Oxford Health Plans – Client Account Medical Provider

<https://www.uhc.com/privacy>

Local 32BJ, Benefit Funds – Client Accounts

<https://health.32bjfunds.org/en-us/privacypolicy.aspx>