

PRIVACY POLICY

This Privacy Policy applies to personal information collected online by THA and its affiliates, partners, and subsidiaries (collectively referred to as “*THA*”) in connection with its U.S.-based websites, microsites or mobile sites that expressly adopt, display or link to this Privacy Policy (collectively referred to as our “*Sites*”).

This Privacy Policy answers the following questions:

1. What information does THA collect about you on our Sites?
2. How do we use the information we collect about you?
3. Does THA share your information with third parties?
4. What choices do you have over how THA uses your information?
5. How does THA secure your information on its Sites?
6. Will this Privacy Policy change?
7. How can I contact THA?

1. What information does THA collect about you on our Sites?

We may collect information about you from a variety of sources, including when:

- you provide us information
- we observe or collect information through technology
- we receive information about you from third parties

Information You Provide

We may ask you to provide information about yourself directly to our Sites, such as the following:

- name
- address
- email address
- location information
- resume, cover letter and similar employment-related materials
- employment history
- information related to customer surveys

Information Observed or Collected Through Technology

Navigational Information. Navigational information, such as the following, is collected by us and our third-party service providers when you use our Sites:

- browser type and version
- operating system
- the Internet service provider used to access our Sites
- IP Address
- use of links to arrive at our Sites

- web pages requested and viewed
- time spent on our Sites
- for our mobile websites, technical information about the device used, such as screen size and how images may appear

Location Information. Our Sites and emails include features that may require collecting different types of location information that we then use for the specific feature you have selected.

Information Obtained from Third parties

We may combine information about you from other sources with the information we have collected about you on our Sites.

For example, in connection with searching and applying for jobs with us, we may use a third party to collect and process the applicant profiles and preferences, monitor website activity, maintain the database based in the U.S and provide plug-ins (such as LinkedIn) at your request. We require that the information you provide on pages hosted by these third parties be maintained by them in confidence. Information you voluntarily supply will be stored in a database, which will be accessed by authorized personnel of THA to address your inquiry or consider you for employment purposes with any of our affiliates. We may also keep the information for future consideration.

2. How do we use the information we collect about you?

The information we learn from you helps us personalize your experience with us and our communications to you and helps us continually improve your experience on our Sites.

We use the information you provide for things like:

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|---|---|
| • improving and developing our Sites | • responding to your inquiries |
| • servicing our customers | • analytics |
| • advertising and marketing, including emails and postal mail | • processing job and affiliate applications |
| • personalizing your experience when visiting our Sites | • market research and surveys |

We use navigational information gathered through technology for determining things like:

- | | |
|---|---|
| • which parts of our Sites are most visited or used | • difficulties visitors may experience in accessing our Sites |
| • how to improve and better transact business | • monitoring the number of visitors to our Sites |
| • the effectiveness of our Sites | • average time spent on our Sites |
| • lead generation | • any programming errors or failures |

3. Does THA share your information with third parties?

We do not sell, rent, or trade your personal information to unrelated third parties except as set forth below. We may share your personal information with the following:

- our contractors, vendors and affiliates so that they can provide information to you about their products and services,
- our contractors, vendors, affiliates and third party service providers in order to perform tasks on our behalf.
- when it is necessary for completing or servicing any transactions that you have authorized and, in some instances, to verify the existence or condition of your account with a financial institution, credit bureau or other third party
- to verify an application for employment
- as required to cooperate with a subpoena, search warrant or other legally valid inquiry, court order or other legal process, or as required or permitted by law
- to protect the rights, property or safety of our Sites, our users or others, including where necessary for the establishment, exercise or defense of legal claims
- as necessary and appropriate to protect THA from harm due to fraud or other illegal activities.

If THA were ever merged with or acquired by another company, or if we acquire another business entity or are involved in a corporate reorganization or other change of control, or if we sell substantially all the assets of a division, affiliate or subsidiary, some or all of the personal information collected about you could be shared with the acquiring or acquired company.

We may also share aggregate data about our customers, traffic patterns, and other related Site information with third parties, but none of this data is connected to an individual's personal information.

4. What choices do you have over how THA uses your information?

We give you choices about the information we collect and how we communicate with you.

Email: You may opt-out of our marketing emails by following the instructions listed in the email that you received. However, even if you opt-out you may still receive non-marketing emails, such as customer service communications.

Location Information:

- a. *Mobile Device Location Information*. Your mobile device settings may allow you to disable location-based services, which will prevent our Sites from accessing your precise mobile device location information. We recommend you review the help or user manual provided with your device for instructions.
- b. *Desktop Device Location Information*. Your desktop web browser may allow you to remove permission you granted through your desktop device for our Sites to access your location information and/or completely block requests for location information. We recommend you review the help or user manual provided with your browser for instructions.

- c. *Email Location Information.* Your email program may allow you to prevent the pixel tags or images in the emails you receive from us from downloading, which will also prevent our service provider from accessing your location information.

Postal Marketing: If you no longer want to receive marketing materials from us via regular postal mail, please e-mail us at service@towerhillatlantic.com and inform us that you want to be removed from THA's postal mailing list, including the postal address you wish to have removed. Include "Privacy Policy" in the Subject Line.

5. How does THA secure your information on its Sites?

Our Sites utilize encryption technology. We also use firewalls and have implemented other reasonable technical, administrative and physical measures designed to protect the personal information in our custody or control from unauthorized access, use, modification and disclosure. Moreover, we regularly monitor our systems for possible vulnerabilities and attacks. While we implement these security measures on our Sites, you should be aware that 100% security is not always possible.

We may enable you to navigate to third-party websites through links on our Sites. We do this for your convenience. If it is not one of our Sites, we don't endorse, may not have any affiliation with, do not control and aren't responsible for those third-party websites and/or their Internet and web practices. Whether the third-party content appears within our Site environment (like a map frame), or you leave our Site for another website to view it, the terms, conditions, and privacy policies of those other websites govern your online experience. Please review their terms of service and privacy policies if you have any question about their practices.

6. Will this Privacy Policy change?

We may make changes to this Privacy Policy at any time, so please review it periodically. We will update the effective date of the Privacy Policy at the time a change is made.

7. How can I contact THA?

If you have questions or concerns with respect to our Privacy Policy, please contact us by e-mailing us at service@towerhillatlantic.com. In the Subject Line, type "Attn: Privacy Policy".

Make sure to include your question, name and contact information.