

THE NEIGHBORHOOD INVESTMENT COMPANY (“NICO”), INC. PRIVACY POLICY

Last Updated October 25, 2019

Welcome to the website (the “**Site**”) of The Neighborhood Investment Company (Nico), Inc. and its affiliates and subsidiaries Nico Asset Management LLC, Nico Property Management LLC, Nico Service LLC, and Neighborhood Acquisitions I, LLC (“**Nico**,” “**we**,” “**us**,” or “**our**”). Nico (1) sponsors the Neighborhood Real Estate Investment Trust (“Neighborhood REIT”), an investment product that allows residents of the Neighborhood REIT properties (“Residents”), neighbors, and other investors to obtain equity in the Neighborhood REIT through investments and other activities described below, (2) manages the Neighborhood REIT properties, and (3) provides related services to Residents (these services, including the Site, will be referred to collectively as the “**Services**”).

This Privacy Policy explains what Personal Data (defined below) we collect, how we use and share that data, and your choices concerning your data.

By using the Services, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not access the Site or otherwise use the Services. Before using the Services or submitting any Personal Data to Nico, please review this Privacy Policy carefully and [contact us](#) if you have any questions.

1. PERSONAL DATA WE COLLECT

We collect information that alone or in combination with other information in our possession could be used to identify you (“**Personal Data**”) as follows:

Personal Data You Provide: We collect Personal Data when you create an account, invest in the Neighborhood REIT, communicate with us, or access or use our Services. The Personal Data collected during these interactions may vary based on what you choose to share with us, but it will generally include your name, email, phone number, address, user name, and password, as well as information about how you use the Services such as your transaction history and a log of your communications with us. If you choose to invest in the Neighborhood REIT, we may need to collect Personal Data such as your income and net worth to verify your eligibility to make such investments. If you are a Resident, we may also collect Personal Data related to your participation in “challenges” (e.g., incentives we may offer that allow you to increase your equity in the Neighborhood REIT). For example, if you participate in our eco-challenge, we will collect energy consumption data from your Nest thermostat.

Other Financial Information: You may be able to provide other financial information, such as your credit card or bank account number, through the Services, but that information is sent directly to our payment processors PaySimple, Inc. and Dwolla, Inc. for processing that is subject to its terms of service and privacy policy. Such financial information is not maintained on our systems and we do not control PaySimple, Inc.’s or Dwolla, Inc.’s data practices.

Personal Data We Collect Through Our Social Media Pages: We may have pages on social media sites like Instagram, Medium, LinkedIn, and Twitter, (“**Social Media Pages**”). When you interact with our Social Media Pages, we will collect Personal Data that you elect to provide to us, such as your contact details. In addition, the companies that host our Social Media Pages may provide us with aggregate information and analytics regarding the use of our Social Media Pages.

Personal Data We Receive Automatically From Your Use of the Services: When you visit, use and interact with the Services, we may receive certain information about your visit, use or interactions. For example, we may monitor the number of people that visit the Services, peak hours of visits, which page(s) are visited, the domains our visitors come from (e.g., google.com, yahoo.com, etc.), and which browsers people use to access the Services (e.g., Firefox, Microsoft Internet Explorer, etc.), and navigation pattern. In particular, the following information is created and automatically logged in our systems:

- **Log data:** Information that your browser automatically sends whenever you visit the Site (“log data”). Log data includes your Internet Protocol address, browser type and settings, the date and time of your request, and how you interacted with the Services.
- **Cookies:** Please see the [“Cookies”](#) section below to learn more about how we use cookies.
- **Device information:** Includes name of the device, operating system, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Usage Information:** We collect information about how you use our Services, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency and duration of your activities.

Cookies: We use cookies to operate and administer our Site, gather usage data on our Site and improve your experience on it. A “cookie” is a piece of information sent to your browser by a website you visit. Cookies can be stored on your computer for different periods of time. Some cookies expire after a certain amount of time, or upon logging out (session cookies), others survive after your browser is closed until a defined expiration date set in the cookie (as determined by the third party placing it), and help recognize your computer when you open your browser and browse the Internet again (persistent cookies). For more details on cookies please visit [All About Cookies](#).

Analytics: We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this data, go to www.google.com/policies/privacy/partners/.

Online Tracking and Do Not Track Signals: We and our third party service providers may use cookies or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Site. Our Site currently does not respond to “Do Not Track” (“DNT”) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do respond to DNT signals in the future, we will update this Privacy Policy.

Your Choices. On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. Please see the links below for guidance on how to modify your web browser’s settings on the most popular browsers:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

Please note that if you limit the ability of websites to set cookies, you may be unable to access certain parts of the Site and you may not be able to benefit from the full functionality of the Site.

Advertising networks may collect Personal Data through the use of cookies. Most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit the Network Advertising Initiative's online resources at <http://www.networkadvertising.org> and follow the opt-out instructions there.

If you access the Site on your mobile device, you may not be able to control tracking technologies through the settings.

2. HOW WE USE PERSONAL DATA

We may use Personal Data for the following purposes:

- To provide the Services, including to process transactions at your request;
- To verify your identity so we can ensure individuals who use the Services are who they claim to be;
- To respond to your inquiries, comments, feedback or questions;
- To send administrative information to you, for example, information regarding the Services, and changes to our terms, conditions, and policies;
- To analyze how you interact with our Service;
- To maintain and improve the content and functionality of the Services (please see the "[Cookies](#)" section above to learn how we use cookies);
- To develop new products and services;
- To prevent fraud, criminal activity, or misuses of our Services, and to ensure the security of our IT systems, architecture and networks; and
- To comply with legal obligations and legal process and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or other third parties.

Aggregated Information. We may aggregate Personal Data and use the aggregated information to analyze the effectiveness of our Services, to improve and add features to our Services, and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Services (such as the percentage of Renters who invest in the Neighborhood REIT) and share aggregated information like general user statistics with prospective business partners. We may collect aggregated information through features of the software that supports our Services, through cookies, and through other means described in this Privacy Policy.

Marketing. We may contact you to tell you about services we believe will be of interest to you. For instance, if you elect to provide your email or telephone number, we may use that information to send you special offers. You may opt out of receiving emails by following the instructions contained in each promotional email we send you. You can also control the email and text marketing messages you receive through your account. In addition, if at any time you do not wish to receive future marketing communications, please [contact us](#). If you unsubscribe from our marketing lists, you will no longer receive marketing communications but we will continue to contact you regarding our Site and Services and to respond to your requests.

3. SHARING AND DISCLOSURE OF PERSONAL DATA

In certain circumstances we may share your Personal Data with third parties without further notice to you, unless required by the law, as set forth below:

- **Vendors and Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions, we may share Personal Data with vendors and service providers, including providers of hosting services, cloud services and other information technology services providers, identity verification services, communications services, advertising and marketing services, payment processors, customer relationship management services, and web analytics services (for more details on the third parties that place cookies through the Site, please see the “[Cookies](#)” section above). Pursuant to our instructions, these parties will access, process or store Personal Data in the course of performing their duties to us.
- **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of all or a portion of our assets, or transition of service to another provider, your Personal Data and other information may be shared in the diligence process with counterparties and others assisting with the transaction and transferred to a successor or affiliate as part of that transaction along with other assets.
- **Legal Requirements:** If required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to meet national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of users of the Services, or the public, or (v) protect against legal liability.
- **Affiliates:** We may share Personal Data with our affiliates, meaning an entity that controls, is controlled by, or is under common control with Nico. Our affiliates may use the Personal Data we share in a manner consistent with this Privacy Policy.

4. UPDATE YOUR INFORMATION

Please log in to your account or [contact us](#) if you need to change or correct your Personal Data.

5. CHILDREN

Our Services are not directed to children who are under the age of 13. Nico does not knowingly collect Personal Data from children under the age of 13. If you have reason to believe that a child under the age of 13 has provided Personal Data to Nico through the Services please [contact us](#) and we will endeavor to delete that information from our databases.

6. LINKS TO OTHER WEBSITES

The Site may contain links to other websites not operated or controlled by Nico including social media services (“**Third Party Sites**”). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

7. SECURITY

You use the Services at your own risk. We implement reasonable technical, administrative and organizational measures to protect Personal Data both online and offline from loss, misuse, and unauthorized access, disclosure, alteration or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the Services or e-mail. Please keep this in mind when disclosing any Personal Data to Nico via

the Internet. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Services, or third party websites.

8. YOUR CHOICES

In certain circumstances providing Personal Data is optional. However, if you choose not to provide Personal Data that is needed to use some features of our Services, you may be unable to use those features. You can also [contact us](#) to ask us to update or correct your Personal Data.

9. CHANGES TO THE PRIVACY POLICY

The Services, and our business may change from time to time. As a result we may change this Privacy Policy at any time. When we do we will post an updated version on this page, unless another type of notice is required by the applicable law. By continuing to use our Services or providing us with Personal Data after we have posted an updated Privacy Policy, or notified you if applicable, you consent to the revised Privacy Policy and practices described in it.

10. CONTACT US

If you have any questions about our Privacy Policy or information practices, please feel free to contact us at privacy@mynico.com.