



VENTURES

Student Living | Residential | Office
Hospitality | Senior Living | International

CA Ventures, LLC and certain of its US affiliates including those listed [here](#) (collectively, “CA Ventures” or “We” or “Us”) complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. CA Ventures has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy (“Privacy Shield Policy”) and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles, We commit to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Us at:

Arshad Khan
akhan@ca-ventures.com
312 800 5380

We have further committed to refer unresolved Privacy Shield complaints to VeraSafe, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <https://www.verasafe.com> for more information or to file a complaint. The services of VeraSafe are provided at no cost to you. As a last resort and in limited situations, individuals may pursue binding arbitration from the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.

We are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). We may also be required at times to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We commit to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU in the context of the employment relationship.

We collect and process personal data (“Personal Data”) of certain individuals (“Data Subjects”) located in European Economic Area (EEA), including employees of CA Ventures. Such personal data includes names, addresses, phone numbers, dates of birth, next of kin, passport information, demographic information, and other information for HR purposes. Such information is stored and processed within a third-party Human Resources system which is eligible to work within the EEA.

The provider of this system is contractually bound to provide adequate safeguards over personal data. We also collect wage-related information, such as salary, benefits, terms, bonuses, and hours, in order to pay our employees and meet our obligations to the taxing authorities. Such wage-related information is shared with a third-party payroll bureau that participates in the EU/US Privacy Shield agreement which commits them to providing adequate safeguards over personal data. Our contract with them also contains appropriate clauses to protect personal information. To meet our legal obligations in the area of health and safety, We hold personal health information, including details of occupational health reports, injuries and sickness. This information is required by law. This data is shared with a third-party occupational health agency which is based in the UK.

Data Subjects have the right to ask what information CA Ventures holds about them, to request access to it, and to correct it if it is inaccurate. If any such Data Subject believes We are not using his or her personal information lawfully, he or she can ask Us to stop using it for a period of time. In some circumstances, he or she may have the right to ask Us to erase his or her personal data.

If Personal Data is to be used for a new purpose that is materially different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party, CA Ventures will provide Data Subjects with an opportunity to choose whether to have their Personal Data so used or disclosed. Requests to opt out of such uses or disclosures of Personal Data should be sent to: akhan@ca-ventures.com

Accountability for Onward Transfers

Except as otherwise provided herein, CA Ventures discloses Personal Data only to third parties who reasonably need to know such data only for the scope of the initial transaction and not for other purposes. Such recipients must agree to abide by confidentiality obligations.

CA Ventures may provide Personal Data to third parties that act as agents, consultants, and contractors to perform tasks on behalf of and under our instructions. For example, CA Ventures may store such Personal Data in the facilities operated by third parties. Such third parties must agree to

use such Personal Data only for the purposes for which they have been engaged by CA Ventures and they must either:

(1) comply with the Privacy Shield principles or another mechanism permitted by the applicable EU data protection law(s) for transfers and processing of Personal Data; or

(2) agree to provide adequate protections for the Personal Data that are no less protective than those set out in this policy.

CA Ventures also may disclose Personal Data for other purposes or to other third parties when a Data Subject has consented to or requested such disclosure. Please be aware that CA Ventures may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. CA Ventures is liable for appropriate onward transfers of personal data to third parties, except where CA Ventures is not responsible for the event giving rise to the damage.