

ONLINE PRIVACY POLICY

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Scope of this Policy

Howard Building Corporation (the "Company" or "we") has developed this privacy policy out of respect for the privacy of our customers and visitors to our website. This policy describes the personal information we collect, use, and disclose about individual consumers who visit or interact with this website, visit any of our offices, facilities, or locations, purchase or inquire about any of our products or services, or otherwise interact or do business with us.

Whenever you visit our website, we will collect some information from you automatically simply by you visiting and navigating through this site, and some voluntarily when you submit information using a form on the website, utilize the Live Chat feature on our website, request information, or use any of the other interactive portions of our website. Through this website, we will collect information that can identify you and/or your activity.

Additionally, whenever you communicate, interact, or do business with us, we will be collecting personal information from you or about you in the course of our interaction or dealings with you, whether online or at any of our physical locations or facilities.



This policy does <u>not</u> apply to job applicants with respect to data collected in the course of submitting job inquiries or applying for a job with us, whether online through the Careers page. Visit the <u>Careers</u> page for the Job Applicant Privacy Policy.

This policy does <u>not</u> apply to our current and former employees and their family members, dependents, and beneficiaries. If you are a California resident (who is a current or former employee of the Company or a family member, dependent, or beneficiary of any of our current or former employees), you may request access to our Employee Privacy Policy by sending an email to **privacy@howardbuilding.com**

Collection of Personal Information and Sensitive Personal Information

Based on your specific transactions and interactions with us or our website, we will or may collect, and we have in the last 12 months collected, the following categories of personal information from or about you. For each category of information, the categories of third parties and service providers to whom we have disclosed the information in the last 12 months are detailed in the chart below. The examples provided for each category are not intended to be an exhaustive list or an indication of all specific pieces of information we collect from or about you in each category, but rather the examples are to provide you a meaningful understanding of the types of information that may be collected within each category.

Category	Personal Identifiers
Examples	Full name.
Disclosed To in Last 12 Months	 Promotional or other fulfilment vendors Communication providers/vendors that facilitate, manage, and send/receive communications on our behalf via email, text/SMS, or phone Data analytics vendors Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants
Sold To or Shared With	Not sold for monetary or other valuable consideration, and not shared for cross-context behavioral advertising.
Retention Period	Duration of our relationship with you plus 4 years.

Category	Contact Information
Examples	email address, home phone number, cell phone number.
Disclosed To in Last 12 Months	 Marketing support vendors Communication providers/vendors that facilitate, manage, and send/receive communications on our behalf via email, text/SMS, or phone Data analytics vendors Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants Insurance carriers, administrators, and brokers Corporate customers (meaning an entity, as opposed to a natural person, that purchases, leases, or finances any of our products or services)
Sold To or	Not sold for monetary or other valuable consideration, and not shared for cross-context
Shared With	behavioral advertising.
Retention Period	Duration of our relationship with you plus 4 years.



Category	Internet Network and Computer Activity
Examples	Date and time of your website visit; webpages visited; links clicked on the website; browser ID; browser type; device ID; operating system; form information downloaded; domain name from which our site was accessed; search history; cookies; internet or other electronic network activity information related to usage of Company networks, servers, intranet, or shared drives, as well as Company-owned computers and electronic devices, including system and file access logs, browsing history, search history, and usage history.
Disclosed To in Last 12 Months	 Data analytics vendors Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants
Sold To or	Not sold for monetary or other valuable consideration, and not shared for cross-context
Shared With	behavioral advertising.
Retention Period	3 years

Category	Geolocation Data
Examples	IP address, GPS location, and latitude and longitude.
Disclosed To in Last 12 Months	 Data analytics vendors Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants
Sold To or	Not sold for monetary or other valuable consideration, and not shared for cross-context
Shared With	behavioral advertising
Retention Period	3 years

Category	Mobile Device Data
Examples	Information collected when you navigate, access, or use any of our websites via mobile device, including device type, software type; data identifying your device if you access our business networks and systems, including cell phone make, model, and serial number, cell phone number, and cell phone provider.
Disclosed To in Last 12 Months	Data analytics vendors
Sold To or	Not sold for monetary or other valuable consideration, and not shared for cross-context
Shared With	behavioral advertising.
Retention Period	3 years

Category	Form and other Electronic Submission Data
Examples	Data submitted through the website, including Contact Us forms.
Disclosed To in Last 12 Months	Not disclosed to any third parties
We May Collect, Process, and Disclose for the Following Business Purposes	 To fulfill or meet the purpose for which you provided the information. To improve user experience on our website. To respond to consumer inquiries, including requests for information. Marketing and sales activities.



Sold To or	Not sold for monetary or other valuable consideration, and not shared for cross-context
Shared With	behavioral advertising.
Retention	2 vicens
Period	3 years

What Sensitive Personal Information We Collect

Of the above categories of Personal Information, the following are categories of Sensitive Personal Information the Company may collect from or about consumers:

1. Geolocation Data (IP address and/or GPS location, latitude & longitude)

Personal information *does not* include:

- Publicly available information from government records.
- Information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media.
- Information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience.
- Deidentified or aggregated information.

Sources of Personal Information

We may collect your personal information from the following sources:

- You the consumer when you visit the website and voluntarily submit information through forms on the
 website, when you visit any of our stores or physical locations, when you purchase or inquire about any
 of our products or services
- We utilize cookies to automatically collect information about our website visitors

To Whom We Disclose Personal Information

We may disclose, sell, or share your personal information to/with the following categories of service providers, contractors, or third parties:

- Promotional or other fulfilment vendors
- Marketing support vendors and vendors that support managing or hosting the website
- Communication providers/vendors that facilitate, manage, and send/receive communications on our behalf via email or phone.
- Data analytics vendors
- Security and risk management vendors, including IT, cybersecurity, and privacy vendors and consultants

Reasons Why We Collect, Use, Retain, and Disclose Personal Information

We may collect and disclose your personal information for any of the following business purposes:

- 1. To fulfill or meet the purpose for which you provided the information.
- 2. To process, complete, and maintain records on transactions.



- 3. To schedule, manage and keep track of customer appointments.
- 4. To complete appraisals.
- 5. To respond to consumer inquiries, including requests for information.
- 6. To contact you by email, telephone calls, mail, or other equivalent forms of communication regarding updates or informative communications related to the functionalities, services, or other information you requested or asked the Company to provide to you.
- 7. To improve user experience on our website.
- 8. To understand the demographics of our website visitors.
- 9. To detect security incidents.
- 10. To debug, identify, and repair errors that impair existing intended functionality of our website.
- 11. To protect against malicious or illegal activity and prosecute those responsible.
- 12. To verify and respond to consumer requests.
- 13. To prevent identity theft.

Do We Sell Your Information?

We do <u>NOT</u> and will not sell your personal information in exchange for monetary or other valuable consideration. We do not share your personal information for cross-context behavioral advertising.

Retention of Personal Information

We will retain each category of Personal Information in accordance with our established data retention schedule as indicated above. Some of the retention periods in the retention schedule above are measured from a particular point in time that has not occurred yet, such as the end of a relationship (whether business, contractual, or transactional) plus a certain number of years. Where no particular event is defined in the retention schedule as the point from which the retention period is measured, we will measure the retention period from either: (1) the date the record or data was collected, created, or last modified; (2) the date of the particular transaction to which the record or data pertains; or (3) another triggering event that is determined to be reasonable and appropriate based on the nature of the data and the legal/business needs for its continued use.

In deciding how long to retain each category of personal information that we collect, we consider many criteria, including, but not limited to the business purposes for which the Personal Information was collected; relevant federal, state and local recordkeeping laws; applicable statutes of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

We apply our data retention procedures on an annual basis to determine if the business purposes for collecting the personal information, and legal reasons for retaining the personal information, have both expired. If so, we will purge the information in a secure manner.

Third Party Vendors

We may use other companies and individuals to perform certain functions on our behalf. Examples include administering e-mail services and running special promotions. Such parties only have access to the personal information needed to perform these functions and may not use or store the information for any other purpose.



In the event we sell or transfer a particular portion of our business assets, information of consumers may be one of the business assets transferred as part of the transaction. If substantially all of our assets are acquired, information of consumers may be transferred as part of the acquisition.

Compliance with Law and Safety

We may disclose specific personal and/or sensitive personal information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect our employees or the public.

Use of Cookies, Pixels, and Other Tracking Technologies

Our website may store or retrieve information on your browser, mostly in the form of cookies. A cookie is a small piece of data (text file) that a website – when visited by a user – places on the user's device to remember information about the user, such as the user's language preference or login information.

This type of cookie is set by us and is referred to as a "first-party cookies." Our website uses first-party cookies primarily to make the website work as you expect it to. For example, we use the information we collect through first-party cookies to allow you to navigate between pages efficiently, analyze how well our website is performing, and understand the content that you spent the most time reviewing. In some cases, we use first-party cookies to store information that we use for targeted advertising.

We also incorporate cookies and similar technologies, such as pixels, tags, and web beacons, from outside our website's domain ("third-party cookies"). Third-party cookies gather information to enable our vendors to provide a range of services to us, including targeted advertising and measuring the success of our advertising campaigns.

Below is a detailed list of the categories of first- and third-party cookies we use on our website. You can prevent the collection of data by non-essential performance, analytics, and marketing cookies by clicking on "Your Privacy Choices" in our website footer and toggling off the related functionality.

How we use cookies

We make use of cookies under the following circumstances and for the following reasons:

- Provide you with services available through the website and to enable you to use some of its features
- Authenticate users and prevent fraudulent use of user accounts
- ➤ Identify if users have accepted the use of cookies on the website
- > Compile data about website traffic and how users use the website to offer a better website experience
- ➤ Understand and save visitor preferences for future visits, such as remembering your login details or language preference, to provide you with a more personal experience, or to avoid you having to reenter your preferences every time you use the website
- > Track your browsing habits to enable us to show advertising which is more likely to be of interest to you, including advertising by third parties on our website



Information on Some of the Cookies in Use on our Site

For information on some of the cookies we use on our site and apps, please review the policies from some of our vendors:

Google Analytics

Essential Cookies

Essential cookies are necessary for the website to function properly and cannot be switched off in our systems. They are usually only set in response to a site visitor's request for services, such as a visitor setting their privacy preferences, logging in, or filling in forms. You can set your browser to block or alert you about these cookies, but blocking these cookies will prevent the website from working correctly or might prevent the Website from working at all.

Non-Essential Cookies

Non-Essential cookies are not essential to the website functionality but serve some other unique purpose in three subcategories:

- 1. "Performance" cookies (sometimes referred to as static cookies) collect information about the user's behavior on the website without collecting personal information, for example:
 - Pages the user visits.
 - Ads the user views.
 - Ads or site features that the user clicks.
- 2. "Functional" cookies (sometimes called preference cookies) track and remember the user's preferences and past choices on the website to provide a personalized user experience. For example, functional cookies can collect:
 - Usernames
 - Passwords
 - Regions
- 3. "Marketing" cookies (sometimes called tracking or advertising cookies) can track:
 - Content the user views
 - Links the user follows
 - The user's browser and device information and IP address

Please note: Organizations can use marketing cookies to track and influence users by building user profiles or displaying advertisements.

Cookie Management



You can control and manage cookies associated with your browser. If you are interested in controlling and managing cookies from your browser including any set by our Website, please refer to http://www.allaboutcookies.org/manage-cookies/index.html for information on different ways to configure your browser's cookie settings.

If you want to clear all cookies left behind by the websites you have visited, here are links where you can download three third party programs that clean out tracking cookies.

- http://www.lavasoftusa.com/products/ad-aware se personal.php
- http://www.spybot.info/en/download/index.html
- http://www.webroot.com/consumer/products/spysweeper/

You may delete cookies from your web browser at any time or block cookies on your equipment, but this may affect the functioning of or even block the website. You can prevent saving of cookies (disable and delete them) by changing your browser settings accordingly at any time. It is possible that some functions will not be available on our website when use of cookies is deactivated. Check the settings of your browser. Below you can find some guidance:

- <u>Safari</u>
- Opera
- Internet Explorer
- Google Chrome
- <u>Mozilla</u>

Do Not Track (DNT) is a privacy preference that users can set if they do not want web services to collect information about their online activity. We do not respond to DNT signals or comply with Global Privacy Controls (GPCs).

You can adjust your advertising preferences on mobile devices through your device settings. Below you can find guidance based on your mobile device type:

- Apple
- Android

DAA and NAI

Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain self-regulatory programs along with websites where people can opt out of interest-based advertising from their members. To opt-out of website interest-based advertising provided by each organization's respective participating companies, visit the DAA's opt-out portal available at http://optout.aboutads.info/, or visit the NAI's opt-out portal available at http://optout.networkadvertising.org/?c=1.

• To opt-out of data collection for interest-based advertising across mobile applications by participating companies, download the DAA's App Choices mobile application opt-out offering found here: https://youradchoices.com/appchoices.



- Some of our vendors do not participate in the DAA or NAI self-regulatory programs for online behavioral advertising or have developed their own processes for allowing consumers to opt-out: https://branch.app.link/optout
- Some devices and apps do not have access to web-based browser cookie opt-outs. To learn more about
 the advertising opt-outs provided by your mobile device's operating system (like iOS and Android) or
 the device manufacture, click here.

External Links

Our website contains links to other sites. We are not responsible for the privacy practices or the content of such websites. To help ensure the protection of your privacy, we recommend that you review the Privacy Policy of any site you visit via a link from our website.

Children Under the Age of 16

We do not knowingly sell or share the personal information of consumers under 16 years of age.

How We Protect the Information that We Collect

The protection of the information that we collect about visitors to our websites is of the utmost importance to us and we take every reasonable measure to ensure that protection, including:

- We use internal encryption on all data stores that house voluntarily captured data.
- > We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
- > We restrict access to private information to those who need such access in the course of their duties for us.

International Visitors

We do not target, market to, or offer our products or services to consumers outside of the United States. You agree not to submit your personally identifiable information through the website if you reside outside the United States.

Rights Under the CCPA and CPRA

This section of the Privacy Policy applies only to California residents who are natural persons. If you are a California resident, you have the following rights pursuant to the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA):

1. <u>Right to Know</u>. The right to request, up to 2 times in a 12-month period, that we identify to you (1) the categories of personal information we have collected about you, (2) the categories of sources from which the personal information was collected, (3) the business or commercial purpose for collecting, selling, or sharing this information, (4) the categories of third parties with whom we share or have shared your



personal information, (5) the categories of personal information that we have sold or shared about you and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each category of third parties to whom the personal information was sold or shared, and (6) the categories of personal information that we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose;

- 2. <u>Right to Access</u>. The right to request, up to 2 times in a 12-month period, that we disclose to you, free of charge, the specific pieces of personal information we have collected from or about you;
- 3. <u>Right to Delete</u>. The right to request, up to 2 times in a 12-month period, that we delete personal information that we collected from you, subject to certain exceptions;
- 4. <u>Right to Correct</u>. The right to request that we correct inaccurate personal information (to the extent such an inaccuracy exists) that we maintain about you;
- 5. The right to designate an authorized agent to submit one of the above requests on your behalf. See below for how you can designate an authorized agent; and
- 6. The right to not be discriminated or retaliated against for exercising any of the above rights.

You can submit any of the above types of consumer requests through any of the options below:

1. Submit a request by email to: privacy@howardbuilding.com

2. Contact us by phone at: (714) 438-2272

How We Will Verify That it is Really You Submitting the Request

If you are a California resident, when you submit a Right to Know, Right to Access, Right to Delete, or Right to Correct request through one of the methods provided above, we will ask you to provide some information in order to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular records in our possession, which depends on the nature of your relationship and interaction with us.

Responding to Your Right to Know, Right to Access, Right to Delete, and Right to Correct Requests

Upon receiving a verifiable request from a California resident, we will confirm receipt of the request no later than 10 business days after receiving it. We endeavor to respond to a verifiable request within 45 calendar days of its receipt. If we require more time (up to an additional 45 calendar days, or 90 calendar days total from the date we receive your request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

For a request to correct inaccurate personal information, we will accept, review, and consider any documentation that you provide, and we may require that you provide documentation to rebut our own documentation that the personal information is accurate. You should make a good-faith effort to provide us with all necessarily information at the time that you make the request to correct. We may deny a request to



correct if we have a good-faith, reasonable, and documented belief that a request to correct is fraudulent or abusive. If we deny your request to correct, we shall inform you of our decision not to comply and provide an explanation as to why we cannot comply with a request, if applicable.

If You Have an Authorized Agent:

If you are a California resident, you can authorize someone else as an authorized agent who can submit a request on your behalf. To do so, you must either: (a) execute a valid, verifiable, and notarized power of attorney; or (b) provide other written, signed authorization that we can then verify. When we receive a request submitted on your behalf by an authorized agent who does not have a power of attorney, that person will be asked to provide written proof that they have your permission to act on your behalf, and we will also contact you and ask you for information to verify your own identity directly with us and not through your authorized agent. We may deny a request from an authorized agent if the agent does not provide your signed permission demonstrating that they have been authorized by you to act on your behalf.

Other California Privacy Rights

The California Civil Code permits California residents with whom we have an established business relationship to request that we provide you with a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the preceding calendar year. To make such a request, please send an email to **privacy@howardbuilding.com**, or write to us at the address listed below. Please mention that you are making a "California Shine the Light" inquiry:

Howard Building Corporation 707 Wilshire Blvd., Suite 3750 Los Angeles, CA 90017

Consent to Terms and Conditions

By using this website, you consent to all terms and conditions expressed in this Privacy Policy.

Changes to Our Privacy Policy

As our services evolve and we perceive the need or desirability of using information collected in other ways, we may from time to time amend this Privacy Policy. We encourage you to check our website frequently to see the current Privacy Policy in effect and any changes that may have been made to them. If we make material changes to this Privacy Policy, we will post the revised Privacy Policy and the revised effective date on this website. Please check back here periodically or contact us at the address listed at the end of this Privacy Policy.

Consumers With Disabilities

This policy is in a form that is accessible to consumers with disabilities.

Questions About the Policy

This website is owned and operated by Howard Building Corporation. If you have any questions about this Privacy Policy, please contact us at **privacy@howardbuilding.com** or call (714) 438-2272.

**This policy was last updated September 30, 2025.