



LUCRUM

COMPANIES

Lucrum Companies, Inc.
Privacy Policy
December 1st, 2023

Overview

Lucrum Companies, Inc. and its subsidiaries: Lucrum Capital Securities, Inc. (“LCS” or “Lucrum Capital Securities”), Lucrum Capital Advisors, Inc. (“LCA” or “Lucrum Capital Advisors”), Lucrum Realty, Inc. (“Lucrum Realty”), and Lucrum Capital, LLC (“Lucrum Capital”) - (collectively as “Lucrum,” “we,” “our,” and/or “us”) value the privacy of individuals who use our website and related services (collectively, our “Services”). This privacy policy (the “Privacy Policy”) explains how we collect, use, and share information from Clients of our Services (“Clients”). By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our Terms of Use.

If you are a California resident, please also review our [California Resident Privacy Notice](#) for more information about the types of personal information we collect and disclose, as well as how to exercise your rights under California law.

Additionally, both Lucrum Capital Advisors and Lucrum Capital Securities each have their own specific privacy policies that are provided to investment advisory and broker-dealer clients, respectfully. To review those disclosures, you can visit LCA's website at www.lucrumcapitaladvisors.com and LCS' website at www.lucrumcapitalsecurities.com. Please note, this is a holistic privacy policy that adds onto each subsidiaries' privacy policies, not to negate or contradict any existing policies.

Information We Collect. We may collect a variety of information from or about you or your devices from various sources, as described below.

1. Information You Provide to Us

- a. **Registration.** When you register to use our Services, we ask you for your name, email address, phone number, relevant financial information, and other required company-specific attestations. We may also ask for documentation to verify your accreditation status if you are a prospective investor client.
- b. **Profile Information.** Once registered to use our Services, we collect additional information from you to create your profile. For example, we ask you for your phone number, company and company address, job title, industry, date of birth, and an image for your profile picture.
- c. **Investment Account.** If you create an investment account through our Services, we ask you for account type (e.g. individual, joint, IRA), legal investing account name, taxpayer ID number or Social Security Number, account address, ACH information or SWIFT account number, accreditation verification, and additional investment account members
- d. **Communications.** If you contact us directly, we may receive additional information about you. For example, when you contact our customer support team, we will receive your name, email address, the contents of a message or attachments that you may send to us, and other information you choose to provide. If you participate in one of our surveys, we may receive information about you relating to the subject matter of the survey. If you subscribe to our newsletter, then we will collect certain information from you, such as your email address. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.
- e. **Verify Your Identity.** For security purposes, we may request additional information from you to verify your identity. For example, we may collect your social security number, date of birth, address, and copy of your government-issued identification.
- f. **Careers.** If you decide that you wish to apply for a job with us, you may submit your contact information, resume, and other related information online. We will collect the information you choose to provide on your resume, such as your education and employment experience. We also collect certain voluntary information about you as described in more detail on our Careers page. You may also apply through LinkedIn. If you do so, we will collect the information you make available to us on LinkedIn.
- g. **Funding and Distribution Information.** If you invest through our Services, we may collect your bank account information to transfer money to your investments and fulfill your distributions and capital returns.

2. Information We Collect When You Use Our Services

- a. **Device Information.** We receive information about the device and software you use to access our Services, including IP address (which may provide us with your general location information), web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

- b. **Usage Information.** To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, your browsing history, the searches you conduct, people you follow, investments you make, your comments, any content you post, clickstream data, advertising interactions, and the dates and times of your visits.
- c. **Information from Cookies and Similar Technologies.** We and our third-party partners may collect information using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services. Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

3. Information We Receive from Third Parties

- a. **Credit Reporting Agencies.** If you are a sponsor of an offering or register for an investment account through our Services, we may receive information about you from credit reporting agencies to comply with applicable laws and industry standards, such as Know Your Business or Know Your Customer (KYC) and Anti-Money Laundering (AML). For example, we may receive your pass/fail status of KYC and AML. We may also receive information from credit reporting agencies to verify your bank accounts and other ownership information.
- b. **Registration Information.** You can log in to the Services using third party credentials such as LinkedIn or Google. These services will authenticate your identity and provide you the option to share certain personal information with us, such as your name and email address to pre-populate our registration form.
- c. **Other third parties.** We may receive additional information about you from third parties such as data or marketing partners and combine it with other information we have about you. For example, we may receive your name, e-mail address, and general location information derived from your IP address from marketing partners to learn more about demand for current and prospective Clients.

4. How We Use the Information We Collect

- a. To provide, maintain, improve, and enhance our Services;
- b. To personalize your experience on our Services such as by providing tailored content and recommendations;
- c. To understand and analyze how you use our Services and develop new products, services, features, and functionality;
- d. To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;

- e. To provide you with investment opportunities and services to match your individual investment goals;
- f. To facilitate offers on behalf of other Clients or third parties.
- g. For marketing and advertising purposes, such as developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you;
- h. To generate anonymized, aggregate data containing only de-identified, non-personal information that we may use to publish reports;
- i. To send you text messages and push notifications;
- j. To facilitate transactions and payments;
- k. To find and prevent fraud, and respond to trust and safety issues that may arise;
- l. For compliance purposes, including enforcing our Terms of Use or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- m. For other purposes for which we provide specific notice at the time the information is collected.

5. How We Share the Information We Collect

- a. **Vendors and Service Providers.** We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.
- b. **Asset Owners.** If you indicate an interest in making an investment of a property or asset through the Services, we will notify the party or parties offering the investment and their affiliates (the "Owner") of your interest and may notify other Clients with whom you have chosen to share information. Note that, upon your admission to an investment offering (a "Asset"), the Owner may share information including, but not limited to, investor names, offering terms, and other relevant information with other members of the Owner. Please refer to the terms of relevant state law for additional detail.
- c. **Investment Sponsors.** If you indicate an interest in making an investment through the Services, such as indicating an interest to buy equity or make a loan in a particular private real estate company, we will notify the party or parties offering the investment and their affiliates (the "Issuer") of your interest and may notify other Clients with whom you have chosen to share information. Note that, upon your admission to an investment offering (a "Company"), the Issuer may share information including, but not limited to, member names, initial capital contributions, and distribution amounts with other members of the Company. Please refer to the terms of the Company's operating agreement and relevant state law for additional detail.
- d. **Social Networks and Other Online Services.** Our Services allow you to, upon your direction, share information with social networking services, such as Twitter, Facebook and Instagram. You understand and agree that the use of your information by any social networking websites will be governed by the privacy policies of these third-party platforms and your settings on that platform. We encourage you to review their privacy policies.

- e. **Marketing.** We do not rent, sell, or share information about you with non affiliated companies for their direct marketing purposes, unless we have your permission.
 - f. **Analytics Partners.** We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn more about Google's practices by visiting Google Privacy & Terms. To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, your browsing history, the searches you conduct, people you follow, investments you make, your comments, any content you post, clickstream data, advertising interactions, and the dates and times of your visits.
 - g. **Advertising Partners.** We work with third-party advertising partners to show you ads that we think may interest you. Some of our advertising partners are members of the Network Advertising Initiative or the Digital Advertising Alliance. If you do not wish to receive personalized ads, please visit their opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt-out of personalized ads in mobile apps.
 - h. **As Required By Law and Similar Disclosures.** We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. For the avoidance of doubt, the disclosure of your information may occur if you post any objectionable content on or through the Services.
 - i. **Merger, Sale, or Other Asset Transfers.** We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time the applicable information was collected.
 - j. **Consent.** We may also disclose your information with your permission.
- 6. Your Choices**
- a. **Sharing Preferences.** We provide you with the choice to allow you to determine your sharing preferences on the Services. Certain information may always be publicly available to others, and other information is made publicly available to others by default.
 - b. **Marketing Communications.** You can unsubscribe from our promotional emails via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.

- c. **Do Not Track.** There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.
- 7. **Third Parties**
 - a. Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.
- 8. **Security**
 - a. We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. However, as no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your information.
- 9. **Children's Privacy**
 - a. We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our Service(s) is directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at info@lucrumcompanies.com.
- 10. **International Visitors**
 - a. Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By providing any information, including personal information, on or to the Services, you consent to such transfer, storage, and processing.
- 11. **Update Your Information.** You can update your account and profile information or close your account through your profile settings.
- 12. **Changes to this Privacy Policy.** We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through the Services, we will notify you through the Services, by email, or other communication.
- 13. **Contact Information.** If you have any questions, comments, or concerns about our processing activities, please email us at info@lucrumcompanies.com. You can also call our office line at 703-206-8116.