

PRIVACY POLICY

Last Modified: January 20th, 2023

This Privacy Policy (this “Policy”) describes the way in which we collect, use, and disclose information, including personal information, about you in connect with your use of the NexCore Group website located at www.nexcoregroup.com (which we refer to in this Policy as the “Site”, which term also refers to any content, functionality and services offered on or through the Site).

The Site is owned and operated by NexCore Companies LLC (also known as NexCore), who we refer to, together with our affiliates, as “NexCore,” “us”, “we” or “our”. When we refer to “you” and “your” in this Policy, we are referring to you as a visitor to and user of the Site.

Please read this Policy carefully before using the Site and before submitting any information, particularly personal information, through the Site. BY USING THE SITE, YOU CONSENT TO THE USE OF YOUR INFORMATION AS SET FORTH IN THIS POLICY.

1. Applicability of and Changes to This Policy.

This Policy applies to information provided to and collected by NexCore through the Site. We may provide you with supplemental or additional privacy notices on specific occasions when we collect or process personal information about you. On those occasions, it is important that you read this Policy together with all such other notices, so that you can be fully aware of how and why we are using your personal information. This Policy supplements all other and additional privacy notices, and is not intended to override any of them (and vice versa).

We reserve the right to update this Policy from time to time by posting a new Policy on this page, and in some cases where changes are material we may also contact you via email or post a notice on the Site homepage to let you know of such changes. It is your responsibility to check this Policy regularly for any changes. You will be able to determine when this Policy was last updated by referring to the “Last Modified” legend at the top. **Your continued use of the Site after any changes have been made constitutes acceptance of those changes, even if you did not take the time to review them.**

2. Types of Personal Information Collected.

“Personal Information” means any information about an individual that can be used to identify that individual. Personal Information does not include anonymous or anonymized data that cannot be used to identify a specific person. Below are the types of Personal Information we collect through the Site:

- a. Identification and Contact Information. This is Personal Information that identifies you as an individual (like your first and last name) and information that enables us to contact you (like your email address, mailing address, and phone number).
- b. Device and Browsing Information. When you visit the Site, we may automatically collect information such as device IP (Internet Protocol) address, browser and device type and version, name and version of your operating system, page views and visits (including pages you visit before and after accessing the Site), and Site interactions and search history. In addition, we may collect technical information from your computer or mobile device concerning your receipt of communications.
- c. Other Information You Voluntarily Provide. When you interact with us through the Site, including emailing us through the Site through our “Contact Us” or similar Site features, we will receive any additional Personal Information you choose to provide as a part of that interaction.
- d. Inferences Drawn from the Above. When you provide any Personal Information, we may use that information to make inferences about your behaviors and preferences.

3. Sources of Personal Information.

- a. Information that You Provide. We will receive any type of Personal Information from you directly when you voluntarily provide it, including when you communicate with us through the Site's "Contact Us" or similar features.
- b. Automatically Collected Information. We may automatically collect certain device and browsing information when you use the Site. We may collect this device and browsing information using "cookies," which are small text files that the Site saves on your computer or mobile device, or similar technologies. We may also collect information using "web beacons," which are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon or using unique links that can distinguish when individual users click the link. Web beacons and unique links, alone or in conjunction with cookies, may help us compile information about your interactions with electronic mail sent to you in connection with the Site. For more information, see the Cookie Policy section below.
- c. Cross-Site Tracking. We do not utilize technical measures in the Site to track your activities across different web sites or online services, whether you configure your browser's Do Not Track feature or otherwise.

4. How We Use Personal Information. We collect and use Personal Information for the following purposes:

- a. Providing the Site. We use your Personal Information to make the Site available to you, and to provide you with requested information, as well as additional products, services or information related to the Site.
- b. Marketing. Subject to rights to opt out and applicable law, we may use Personal Information to send you newsletters and promotional materials and to provide you with targeted offers and information about additional opportunities related to the Site.
- c. Analytics and Site Improvements. We use your Personal Information for improving the Site, including by:
 - i. combining or aggregating any of the information collected through the Site for generating and analyzing statistics about your use of the Site and user demographics and traffic patterns; and
 - ii. using anonymized data that may or may not be derived from Personal Information but does not personally identify you, both for disclosure to third parties and for the purpose of enhancing the Site and developing new service offerings.
- d. Legal Matters. We will use Personal Information as necessary to comply with legal requirements, as well as to enforce our rights and remedies and defend against legal claims.
- e. Security. We may use your Personal Information for safety and security purposes, including detecting, preventing, and responding to fraud, intellectual property infringement, violations of the Site's Terms of Use, violations, of law or other misuse of the Site.

We will not use your Personal Information for any purpose that is not reasonably necessary to nor compatible with the purposes set forth in this Policy (or any other policy provided to you when we collect such information), unless we obtain your consent to do so.

We do not sell or use Personal Information for targeted advertising.

5. How and Why We Disclose Personal Information. We may disclose Personal Information as follows:

- a. Service Providers. We may engage third-party service providers (such as website hosting and operation providers, analytics providers, and security providers) to assist in managing, marketing and improving the Site. Our engagement of third-party service providers is often necessary for us to provide the Site to you, particularly where such third-party service providers ensure that the Site is operating and secure. We will accordingly provide Personal Information to these service providers who need such information to perform the relevant service. We provide our service providers only with the information they need to perform their respective services, and works with such service providers to respect and protect your privacy.
- b. Affiliates. We may share your Personal Information with our company affiliates within the NexCore Group, including investment funds and opportunities managed by us or our affiliates, so that we or such affiliates/funds may provide you with information regarding opportunities, investments, products, and services.
- c. Analytics Providers. We may share Personal Information with data analytics platforms, to compile statics and evaluate and perform analytics and site improvements.
- d. Reorganizations. We may also transfer your Personal Information to an affiliate, a subsidiary, or a third party in the event of any reorganization, merger, acquisition or sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding, provided that any such entity that we transfer Personal Information to will not be permitted to process your Personal Information other than as described in this Policy without providing you notice and, if required by applicable laws, obtaining your consent.
- e. Other Disclosure. We may disclose Personal Information about you to others: (i) with your valid consent to do so; (ii) to comply with a valid subpoena, legal order, court order, legal process, or other legal obligation; (iii) to enforce any Site terms and conditions or policies, including the Site's Terms of Use; (iv) to enforce any other agreement between you and us (or our affiliates/funds); (v) to pursue available legal remedies or defend legal claims; (vi) to protect our (or our affiliates' or funds') rights, the rights of other users of the Site, the integrity of the Site, or your safety or the safety of others; and (vii) to detect, prevent, or respond to fraud, intellectual property infringement, violations of the Site's Terms of Use, violations of law, or other misuse of the Site.

6. Storage and Retention of Personal Information.

- a. Jurisdiction. The Site is intended for use by United States persons, and information collected through the Site will be stored in, processed in, and subject to the laws of the United States. Accordingly, information collected through the Site may be available to the United States government or its agencies under a lawful order made in the United States. If you are accessing or using the Site from outside the United States, you consent to the transfer to, storage in, and processing within the United States, and understand that the United States may not provide the same level of protection for your information as your home country. We make no representation that its practices as described in this Policy are compliant with the laws of other jurisdictions, including laws that apply to the collection, use, processing, disclosure, and security of Personal Information.
- b. Security. We are committed to protecting your Personal Information from unauthorized access, use, or disclosure. The Site and its operators maintain administrative, technical, and physical safeguards designed to protect the Personal Information collected through the Site. However, no information or communication Site can be 100% secure, so we cannot guarantee the absolute security of your information. In addition, we are not responsible for the security of information that you transmit to the Site over networks that we do not control, including the Internet and wireless networks.

- c. Retention. We will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations. We will also retain Personal Information for as long as we have any legal, tax, accounting, risk management, or other business need to do so.

7. Cookie Policy. This section provides our cookie policy and describes how we use cookies and similar technologies.

- a. Cookies. Cookies are small pieces of data that are stored on your computer, mobile phone, or other device when you first visit a page. We use cookies, web beacons and similar technologies (collectively, “Cookies”) to enhance your user experience, understand your usage of the Site, and to perform analytics. Cookies may also be set by other websites or services that run content on the page you are visiting. The provision of your data via Cookies is voluntary except for those Cookies that we place on your device because they are necessary for the performance of the Site. We use “session cookies” and “persistent cookies.” Session Cookies are temporary Cookies that remain on your device until you leave the Site. A persistent Cookie may remain on your device for much longer until you manually delete it.
- b. Use. Cookies can contain the following information about you and your use of the Site: browser type, search preferences, data relating to which pages of the Site that you have visited, and the date and time of your use. We use Cookies for the following purposes:
 - i. To enable and support security features, prevent fraud, and protect your data from unauthorized access;
 - ii. To enable features and provide you with personalized content; and
 - iii. To analyze how you use the Site and to monitor site performance. These Cookies help us to identify and fix errors, understand and improve services, research and test out different features, and monitor how you reached the Site.
- c. Opting Out. You can control and/or delete cookies as you wish – for details, see <https://www.aboutcookies.org/>. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit the Site, and some services and functionalities may not work as intended.

8. Your Rights and Choices.

- a. Accessing Information. You have the right to confirm whether we are processing your Personal Information. You also have her right to obtain a copy of your own Personal Information that you previously provided to us, and to receive that information in a portable and, to the extent technically feasible, readily usable format.
- b. Reviewing and Correcting Information. You have the right to request that we update or correct contact information and other Personal Information stored about you.
- c. Opting Out of Certain Communications. You can always opt out of receiving promotional and marketing communications from us by following the “Unsubscribe” link included in such communications. Please note that notwithstanding your communication preferences, we may need to contact you regarding any potential or ongoing business relationship, as required by law, or regarding legal matters. However, we will not send you promotional or marketing communications after you have opted out of receiving them.
- d. Deleting Information. As noted above, we have standard retention practices with respect to Personal Information. You do have the right to request earlier removal of your Personal Information. Please note

that we may not be able to completely remove Personal Information in certain circumstances. This will be true if the data is not in a searchable format, if it is retained in backup systems, if we need the information in connection with a potential or ongoing business relationship, if it is needed to prevent fraud or abuse, or if we are otherwise required by law to keep it.

- e. **Exercising Your Rights.** To exercise any of the above rights, or if you have any questions regarding our practices regarding Personal Information, please contact us at PrivacyCompliance@nexcoregroup.com. Please note that we may be required to request information from you to verify your identity in connection with any such request, as a security measure to ensure that your Personal Information is not disclosed to any person who has no right to receive it. If you make any request to exercise your rights, we will respond within the time period required by law (or if no time period is required, within a reasonable period of time). If we are unable to comply with your request, we will inform you of this. If you do not agree with any action we have taken following a request to exercise your rights, or otherwise object to our handling of your Personal Information, you may have the right to appeal or to raise your objection with your state's regulatory authority. We would, however, appreciate the opportunity to address your concerns directly before you approach a regulatory authority, so please contact us in the first instance, at PrivacyCompliance@nexcoregroup.com.
 - f. **Rights of California Persons.** If you are a resident of California, please see the Privacy Notice for California Persons, available at <https://nexcoregroup.com/ncgprivacypolicyca>.
- 9. Third-Party Websites.** The Site may contain links to websites operated by third parties. You acknowledge and agree that we are not responsible for the collection and use of your information by such websites that are not under our control, and this Policy does not apply to any third-party websites. We encourage you to review the privacy policies of each website you visit.
- 10. Children's Information.** The Site is not directed to, nor does we knowingly collect information from, children under the age of 13. If you become aware that your child or any child under your care has provided information without your consent, please contact us immediately at PrivacyCompliance@nexcoregroup.com.