

## OVERVIEW

Your privacy matters to us. This Privacy Policy ("Privacy Policy") explains personal information Spokane ADU Advisors, LLC. USA Inc., a Washington State Limited Liability Company (the "Company"), collects about you when you access or use our Site or Services or interact with us in response to an email or other outreach from us or through any third-party application process. This Privacy Policy also explains how we may use or disclose personal information that we collect about you.

This Privacy Policy applies to you whenever you access or use any of our Site or Services, download anything from our Site, or interact with us in response to an email, request for information, or other outreach from us or through any third-party application process. This Privacy Policy does not govern information you choose to exchange directly with other Users of the Site, as we have no direct control over the collection or use of that information. Please use appropriate precautions in sharing your information with such Users.

In addition to this Privacy Policy, your relationship with the Company is also governed by our Terms of Service and transaction documents you may enter into in connection with making an investment through the Site. You should carefully review those documents and the Terms of Service. If you do not understand or agree with the terms of this Privacy Policy and the Terms of Service, please do not access or use any of the Site or Services.

## Some Definitions

The following are definitions for some terms used in this Privacy Policy:

- "Affiliate" means an entity that controls, is controlled by, or is under common control with the Company, whether the control results from equity ownership, contract, overlapping management, or otherwise.
- "Content" refers to all text, images, photographs, graphics, logos, illustrations, descriptions, data, tools, features, pages, and other materials provided on the Site, as well as the selection, assembly, arrangement, "look and feel," and design of our Site.
- "Services" the Content, products, or services offered on or through the Site.
- "Site" refers to, together and collectively, the domains and subdomains of our website at retokens.com.
- "User" means anyone who accesses and/or uses any of our Site or Services.
- "We," "us," and "our" refer to the Company and its Affiliates.

## Your Consent

By using or accessing any of our Site or Services, downloading anything from any of our Site, or interacting with us in response to an email, request for information, or other outreach from us or through any third-party application process, you agree to the terms of this Privacy Policy and consent to the collection, use, and sharing of your personal information subject to and consistent with the term of this Privacy Policy and applicable laws and other notices you may receive from us. If you do not understand or do not agree with the terms of this Privacy Policy, please do not use the Site. We may also ask you to indicate your consent more formally by checking a box or by taking an affirmative action within the Site. If you have any questions or concerns regarding this Privacy Policy, you should contact us at [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com).

## Changes to this Policy

This Privacy Policy is subject to change. When we make a change to the Privacy Policy, we will post the most current version of the policy here. Each time you visit one of our Site or Services, download anything from our Site, or interact with us in response to an email, request for information, or other outreach from us or through any authorized third-party application process, the most current version of our Privacy Policy will apply.

## PERSONAL INFORMATION WE COLLECT

To help us to provide Services, we collect personal information about you through several means.

### How We Collect Personal Information

**Direct Means.** We collect personal information from you directly by asking you for it when you open an account or in other instances when you contact us or access or use any of our Site or Services. In fact, various laws *require* that we collect some of the kinds of personal information we ask for, such as anti-fraud / anti-money laundering laws and “Know Your Customer” obligations. In addition to personal information that we are required to obtain from you by law, we may ask you for other personal information that you can choose, at your option, provide or withhold, and any such information provided will be subject to this policy.

**Automatic or Passive Means.** Whenever you visit, use, access, or interact with any of our Site or Services, we use “cookies” and tracking technologies (further explained below) to collect data about you

and your activities on our Site or use of our Services automatically or passively. These cookies help us better understand how our users navigate through our Site, learn what content is being viewed, and administer and improve our Site. Cookies are small text files that web servers place on an internet user's computer or mobile device that are designed to store basic information and to recognize your browser or mobile device.

**Third-Party Sources.** We may obtain information about you from various third parties, including: (1) service providers we engage to conduct certain functions on our behalf, such as to verify the identities of the Users of our Services or Site; (2) analytics providers, who we use to assist us better understand who is using our Site and Services; and (3) advertising, social media and market research providers and partners whom we engage or with whom we partner for advertising, social media or market research services, as well as for referral purposes.

## **Types of Information We Collect**

### **Personal Information**

The type of personal information we collect from and about you online will depend on how you interact with us. The personal information we collect from or about you may include, but may not be limited to, the following:

- Your name, residential and business address, email address, citizenship, telephone number, personal financial information such as gross annual income and cash on hand.
- Copies of your correspondence via email, phone, or social media, if you contact us.
- Information needed to grant us access to your accounts on third-party websites or applications ("Third-Party Site"). The personal information collected from the Third-Party Site may be used to register your User account and to provide some of our services.
- Your username and password.
- Information that is about you individually but that does not identify you, such as your investment history and experience, investment portfolio, and your educational or professional history.

### **Personal Financial Information**

When you subscribe to have one of our builders come to your location for the purpose of building an accessory dwelling unit, you will be asked for personal information. To help facilitate the subscription process, you will also be required to provide personal financial information, including, but not limited to:

- Financial information, including your income and net worth.
- Information to confirm your place of residence.
- Information about your bank accounts or other sources of payment.
- Information to confirm your relationship with other parties associated with the Site or our Services.
- Access credentials you establish to receive our Services or access our Site.
- Information about your relationship to or ownership in any entity that uses our Services.
- Your preferences for receiving, and how you engage with, our marketing communications.

### **Non-Identifiable Information and Aggregated Personal Information**

We or our Integrated Service Providers may automatically collect certain information when you access or interact with our Site or Services, including, but limited to: (1) Your IP address or other unique identifier from the computer, mobile device, tablet, or other device you use to access any of our Site or Services; (2) the computer or other device type you use to access or use our Site or Services, the type of browser on the device, the browser's settings, and the device's operating system, software, and hardware; (3) your mobile device's unique mobile platform advertising identifier, if you access any of our Site or Services from a mobile device; and (4) information about your interaction with our Site or Services, such as: the date and time of your visit to the Site; the number of times you visit our Site; the areas, pages, and features of or on our Site you visit or use; the amount of time you spend viewing or using the Site or particular areas of them; emails that you open, forward or click-through to our Site; and other website you may visit from our Site.

We or our Integrated Service Providers collect this information through the use of "cookies" and other technologies to better understand how our users navigate through our Site, learn what content is being viewed, and administer and improve our Site. We may use Google Analytics cookies for data analytics purposes. You can find more information on how Google uses data from these cookies at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

You may stop or restrict the placement of our cookies, Google's cookies and third-party cookies on your computer, device or mobile phone by adjusting your web browser preferences or a "Do Not Track" setting in your web browser or by activating the appropriate setting on your mobile phone. You can also restrict marketing cookies by rejecting cookies on the website. If you do so, you may still use our Site, but this may interfere with some of its functionality.

You may also clear cookies from your computer or device via your web browser settings. You may also wish to use a Google Analytics opt-out web browser add-on. Information on this option is available at: <http://support.google.com/analytics/bin/answer.py?hl=en&answer=2700409>.

We may compile personal and other information on an aggregate basis that does not identify you individually. This information could include, without limitation, the number of Users who have registered to use our platform, demographic information about Users of our platform, and individual purchase preferences. We may use aggregate information and share aggregate information with third parties for any of the purposes specified in this Privacy Policy, and for any other lawful purpose.

We may also collect personal information associated with feedback and correspondence from or with you, such as information you provide when you request information from us or otherwise correspond with us, including our Site or via social networking sites or services.

### **Combining Information**

We may take personal information we collect from or about you directly and combine that with other information, including personal information we obtain about from third-party sources or that we automatically collect about you through our Site or Services.

### **HOW WE USE PERSONAL INFORMATION WE COLLECT**

We use personal information that we collect from or about you to:

- Deliver our Services to you.
- Meet and enforce legal requirements, including ones pertaining to the determination of your eligibility to invest and identity verification, and “Know Your Customer” protocols.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Protect against, investigate, and deter fraudulent, unauthorized, and illegal activity.
- Personalize your experience on our Site or when engaging with us.
- Provide advertising, including targeted advertising, in order to promote our Services.
- Perform analytics about your access and use of our Site or Services and advertisements.

- On a de-identified, aggregated basis, analyze how you use the Services to help us understand traffic patterns and know if there are problems with the Services or areas in which we can improve.
- Communicate with you, such as through email or text messages, in order to provide you with information and updates about us and our Services, and to respond to your comments and questions.

## **WITH WHOM WE SHARE PERSONAL INFORMATION WE COLLECT**

Without your consent, we do not rent, sell, or share personal information with unrelated third parties, except as necessary to complete a transaction or provide a service you have requested, or as provided in this Privacy Policy.

### **Third Parties with Whom We Share Personal Information**

We used third parties to perform services for the Site. Each of these parties will need some of your personal and/or financial information to perform their services. Subject to the terms of this Privacy Policy and applicable law, we may share personal information we collect from or about you with the following categories of third parties:

- The builder who builds your accessory dwelling unit
- Our Affiliates. We may provide information to one or more of our Affiliates. All of our Affiliates will also be bound by the terms of this Privacy Policy. Please see 'Opting Out of Sharing Information with Affiliated and Non-Affiliated Third Parties for Marketing Purposes' below for more information on how to opt out.
- Government agencies, as required by laws and regulations.
- Our service providers. We work with various third-party service providers, including database administrators, cloud computing services, advertising services, data analysts, identity verification services, accountants, auditors, payment processors, and escrow partners. We may provide your personal information to them to the extent required by law, required or needed to fulfill our obligations to you, or required or needed by such service providers to perform their service.

### **Other Instances in Which We Share Information with Third Parties**

In addition to the third parties described above, we may transfer personal information we collect from or about you to a third party:

- ***In the event of a change of control.*** If our company is sold, or otherwise bought in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our Company's assets, whether as a going concern or as a part of bankruptcy,

liquidation, or similar proceeding, in which personal information held by our Company about our Users is among the assets transferred, all information will be transferred to our successor. Should such a change of control occur, we will use reasonable efforts to try to require the transferee to use personal information we have collected in a manner consistent with this Privacy Policy; or,

- ***To meet legal obligations or for protection.*** We may also transfer your personal information to a third party when required by law or to respond to legal process or as necessary to protect our customers, lives, the security of our Services, or our rights or property.

\* \* \*

The manner of operation of our partners, service providers, and other third parties with whom we share or disclose your information is governed by the policies of those third parties, and we shall have no liability or responsibility for their privacy practices or other actions. Generally, you can easily recognize when one of our partners is associated with a service. However, certain parties may provide services anonymously, and, in that case, we will only share information that is directly related to the applicable service(s).

### **Aggregated / De-Identified Information**

Collected personal information may be aggregated and/or de-identified (in which any details that identify you personally have been removed). We may share this aggregated and/or de-identified information with third-party providers to help deliver products, services and content that are better tailored to the Users of our Site or Services and for our own business purposes where permissible under applicable law.

### **HOW WE SAFEGUARD PERSONAL INFORMATION WE COLLECT**

Your account with us is protected by a password for your privacy and security. You must prevent unauthorized access to your account and personal information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser, including by signing off after you have finished accessing your account.

We are committed to safeguarding the confidentiality of your information but cannot guarantee the security of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we (1) encrypt any information we store, (2) transmit information via https and (3) limit access to this information to (a) authorized employees and contractors who need to know that information in order to operate, develop, and/or improve our Site or Services and (b) third parties that must receive that information in order to facilitate provision of our Services.

Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches. Unauthorized entry or use, hardware or software failure, or other factors may compromise the security of User information at any time. If you believe your information may not be secure for any reason, please contact us immediately at [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com).

In addition, when you use our Site or Services you might be required or permitted to visit other websites. We take no responsibility for the security of such websites and/or systems.

## **YOUR CHOICES REGARDING PERSONAL INFORMATION**

You have several choices regarding the use of personal information we collect about or from you.

### **Changing or Deleting Your Personal Data**

A User of our Site or Services may review, update, correct or delete personal information furnished by the User by contacting us at [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com) or, in certain cases, by accessing their User account. For your protection, we may only share and update the personal information associated with the specific email address that you use to send us your request, and we may need to verify your identity before doing so. We will try to comply with such requests in a reasonably timely manner. If you completely and permanently delete all of your personal information, then your User account will be deactivated. If you wish to cancel your account, you may do so by emailing us at [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com), and any personal information associated with your account will be deleted as soon as is reasonably practical or as required by applicable law, subject to our data retention policy.

### **Data Retention**

We retain personal information we receive for as long as you use any of our Site or Services, or as necessary to fulfill the purposes for which it was collected, provide our Services, resolve disputes, establish legal defenses, enforce our agreements, and comply with applicable laws. We may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law. We may retain an archived copy of your records as required by law or for legitimate business purposes.



### **Download or Access Personal Information**

You can ask us for a copy of your personal information, including a copy in machine readable form, by emailing us at [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com)

### **Opting Out of Email Communications**

We may use some of the information we collect for marketing purposes, including to send you promotional communications about new features, products, events, or other opportunities. If you wish to stop receiving these communications or to opt out of use of your information for these purposes, please follow the opt-out instructions, such as clicking “Unsubscribe” (or similar opt-out language), in those communications. You can also contact us at [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com) to opt out. Despite your indicated email preferences, we may send you service-related communications, including notices of any updates to our Terms of Service or this Privacy Policy no less than annually and as such updates occur. Opting out will **not** unsubscribe you from important communications regarding your account on our Site, security-related matters or those notices required by applicable law. To unsubscribe from a third party’s email communications, contact that third party directly or follow the instructions to unsubscribe in the applicable marketing email.

### **Opting Out of Sharing Information with Affiliated and Non-Affiliated Third Parties for Marketing Purposes**

If you would like to opt out of sharing any of your information with Affiliates and non-Affiliate third parties for marketing or solicitation purposes, please contact us at [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com).

### **OUR USE OF TRACKING TECHNOLOGIES**

We may use cookies, pixel tags, or other technologies on our Site or as part of our Services, including to collect information automatically or passively.

A “cookie” is a small amount of data, often including an anonymous unique identifier, which is sent to your browser from a website’s computers and stored on your computer’s hard drive. Cookies can be used to provide you with a tailored user experience and to make it easier for you to use a website upon a future visit. We may include cookies on our Site and use them to recognize you when you return to our Site. Cookies must be enabled on your web browser if you wish to access certain personalized features of our Site or Services. By using any of our Site or Services, you consent to our use of cookies.

You might be able to set your browser so that it does not accept cookies. The following website may have information useful if you wish to change your browser's settings so it does not accept cookies: <https://www.allaboutcookies.org/manage-cookies/>. Unless you have adjusted your browser settings to refuse cookies, our system will send cookies as soon as you access our Site or Services. Again, by using our Site or Services, you consent to our use of cookies.

We may also use so-called "pixel tags"—small graphic images—to tell us what parts of our Site have been visited or to measure the effectiveness of searches customers perform on our Site. Pixel tags are sometimes referred to as "web beacons." Pixel tags also enable us to send email messages in a format customers can read, and they inform us whether emails have been opened, to help ensure that our messages are of interest to our Users.

## **ADDITIONAL PRIVACY-RELATED INFORMATION**

### **Links to Third-Party Websites**

We may provide links to third-party websites on our Site or in our communications or other materials exchanged with you. We have no control over those websites, and they may be subject to their own terms of service and privacy policies. As such, we do not endorse and are not responsible for the availability of, or for any content, advertising, products, or other materials on or available from, those third-party websites. By using any of our Site or Services, you agree that we will not be liable for any damage or loss caused by your use of or reliance on any content, advertising, products, or other materials on or available from these third-party websites.

### **How We Respond to Do Not Track Signals**

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to website and other online services you visit. To find out more about Do Not Track, please visit <http://www.allaboutdnt.com>.

If you access or use any of our Site or Services from a mobile device, we may collect mobile advertising identifiers to provide certain Services or facilitate use of our Site. Users may be able to opt out of interest-based advertisements through the most recent applicable settings features of their mobile devices. These opportunities are subject to the offerings made available by the third-party operating system providers and subject to their privacy policies, if any, and not any our offerings or our Privacy Policy. Please note that opting out of mobile advertising identifier collection may prevent certain Services from functioning properly.

## **California Privacy**

This section of the Privacy Policy provides information to California residents whose personal information is processed pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), whether through the Site or offline. It describes the categories of personal information that the Company collects, and the purposes for which that information is collected. This section does not apply to personal information that is protected under federal financial privacy laws. Personal information does not include information that is publicly available or that has been de-identified or aggregated. California residents should refer to the sections “Personal Information We Collect” and “How We Use Personal Information We Collect” for a discussion of the personal information we collect and how we collect and use it. As a California resident, beginning after January 1, 2021, you may have certain rights over personal information we have about you. We may share personal information with our service providers, with third parties with whom we jointly offer products or services, in the context of a merger, acquisition, bankruptcy, or other corporate transaction, or as otherwise permitted by the CCPA.

## **Users Outside the United States**

The Company is based in the United States. Our Site and Services are controlled and operated by the Company from the United States and are not intended to subject us to the laws or jurisdiction of any state, country, or territory other than that of the United States. Your personal information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Site or Services, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

## **Children’s Policy**

Our Site and Services are not intended for children under the age of 18. We do not use our Site or Services to knowingly solicit data from, or market to, children under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com). We will take steps to delete such information from our files within a reasonable time.

## **CONTACT US**

Please contact [info@SpokaneADUadvisors.com](mailto:info@SpokaneADUadvisors.com) if you have questions about this Privacy Policy, your personal information, or our Site or Services.