**Privacy Policy**

**INTRODUCTION**

This Privacy Policy describes how VanTrust Real Estate, LLC and its subsidiaries and affiliates (“VanTrust”, “we”, “us”, or “our”) collect, use, store, and share your personal information. This Privacy Policy applies to: (1) information we collect when you access and/or use our websites (“Websites”); (2) information we collect when you do business with us; (3) information we collect when you communicate with us in any manner, including by e-mail, fax, telephone, or in-person; and (4) information we collect about you from third parties, such as service providers and non-affiliated third parties.

**ACKNOWLEDGEMENT**
Please read this Privacy Policy carefully. The practices described herein are subject to applicable laws in the places in which we operate.

**BY ACCESSING AND/OR USING OUR WEBSITES, VISITING OUR PROPERTIES, OR COMMUNICATING WITH US IN ANY MANNER, YOU REPRESENT THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY.**

**WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT, FROM WHERE, AND HOW IS IT USED?**
Depending on how you interact with our Websites, how you communicate with us, and how we communicate with unaffiliated third parties, we may collect a variety of categories of your personal information.

Below we outline those categories and include a description from where we collect the information and how it is used.

**Please note, we have adopted California Privacy Rights (CCPA) for all users within the United States, regardless of the state in which you reside.**

In using our services, you may occasionally provide information, such as your name, your contact information, or other information about yourself to VanTrust, our affiliates, our service providers, or other businesses which you may contact while using the services. VanTrust and these other entities may use this information and other technical information about your use of our services to tailor their presentations to you, to facilitate your use of our services or to communicate separately with you. We also may share personal information with other companies (“Third Parties”) as described in this policy or at the time that your information is collected. You have the right to opt-out to limit our sharing of your information, as described below.

**DO WE SELL OR SHARE YOUR PERSONAL INFORMATION?**We do not sell your personal information. We also have no actual knowledge of selling the personal information of minors under the age of 18. We do, however, disclose your personal information for certain business purposes, including:

* **With your consent.** We may disclose your personal information with your consent in writing; online, through “click-through” agreements; when you accept the terms of use on our Websites, where applicable; orally, either in person or on the phone; or by other means.
* **In a business transfer.** We may disclose your personal information as part of a corporate business transaction, such as a merger or acquisition, joint venture, corporate reorganization, financing, or sale of company assets, or in the unlikely event of insolvency, bankruptcy, or receivership, in which such information could be transferred to third parties as a business asset in the transaction.
* **To service providers.** We may disclose your personal information to third party vendors and partners who complete transactions or perform services on our behalf (e.g., complete your reservation, provide a service at one of our Properties, complete a transaction).
* **To subsidiaries and affiliates.** We may disclose your personal information to subsidiaries and affiliates to further facilitate your use of our Websites and to ensure your visit and experience at one of our Properties is smooth and consistent.
* **For legal process and protection.** We may disclose your personal information to satisfy any law, regulation, legal process, governmental request, or where we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to:
	+ Enforce or apply agreements, or initiate, render, bill, and collect for our services
	+ Protect our rights or interests, property or safety or that of others
	+ Protect users of our Websites or visitors to one of our Properties, or other carriers or providers from fraudulent, abusive, or unlawful use of, or subscription to, such services
	+ Facilitate or verify the appropriate calculation of taxes, fees, or other obligations due to a local, state, or federal government
	+ In case of emergency.

Some Personal Information is gathered when you sign up for our communications, enter a site feedback or contact form, or complete a client satisfaction survey. During the on-line registration process, for example, VanTrust may ask for your name, email address, telephone number, postal code, occupation, industry information and professional interests. The more information you volunteer (and the more accurate it is), the better we can assist you with your needs.

**LINKS TO THIRD-PARTY SITES**
Our Websites may contain links to third party websites and services. Please note that these links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly suggest you review. This Privacy Policy applies to our Websites only, and we do not accept any responsibility or liability for the policies or practices of any third parties.

**THIRD-PARTY TRACKING / DO NOT TRACK**
Our Websites may, from time to time, collect information about your online activities, over time and across our different Websites. When you use our Websites, third parties may also collect information about your online activities, over time and across different internet websites, online or cloud computing services, online applications, or mobile applications. Some browsers support a “Do Not Track” feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. Our Websites do not currently change the way they operate based upon detection of a “Do Not Track” or similar signal.

**SOCIAL MEDIA**
Our Websites may, from time to time, contain links to and from social media platforms. When you use those links, we may collect additional information from or about you, such as your screen names, profile picture, contact information, contact list, and the profile pictures of your contacts, through the social media platform. Please be advised that social media platforms may also collect information from you. We do not have control over the collection, use and sharing practices of social media platforms. We therefore encourage you to review their usage and disclosure policies and practices, including their data security practices, before using the social media platforms.

**HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?**
The security of your personal information is important to us. That is why we take commercially reasonable steps to make sure your personal information is protected. Although no system can guarantee the complete security of your personal information, we will use our best efforts to maintain commercially reasonable technical, organizational, and physical safeguards, consistent with applicable law, to protect your personal information.

**HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**
We keep your personal information for as long as necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your personal information, we will do so in a way that is secure and appropriate to the nature of the information subject to disposal.

**COOKIE STATEMENT**
We may use cookies (browser and flash), beacons, pixel tags, scripts, and other similar technologies from time to time to support the functionality of our Websites and in our communications with you. This technology provides a better experience when you use our Websites and allows us to improve our services.

We also use analytic software such as Google Analytics to help better understand how our Websites function on your device(s) and for analytical purposes. You can opt-out of Google Analytics by installing Google’s opt-out browser add-on here <https://tools.google.com/dlpage/gaoptout>. Please be aware that if you opt-out, this may cause some of our Websites to not function correctly or at all.
Below are various types of cookies our Websites may use from time to time:

* **Browser Cookies.** Certain features of our Websites may use browser cookies. A browser cookie is a small piece of information stored by your web browser. That cookie then communicates with servers, ours or those of other companies that we authorize to collect data for us and allows recognition of your personal computer.
* **Flash Cookies.** Certain features of our Websites may use locally stored objects called flash cookies to collect and store information about your preferences and navigation to, from and on our Websites. We also may include cookies to provide aggregate reporting. Our Websites may also allow Adobe to set and enable special cookies that are necessary to deliver video content for Adobe Flash Player. Please note, you cannot remove flash cookies simply by changing your browser settings. If you would like to limit the websites that can store information in flash cookies on your device, you must visit the Adobe website: [www.macromedia.com/support/documentation/en/flashplayer/help/settings\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html)
* **Beacons.** Our Websites and e-mails may contain small electronic files known as beacons (also referred to as web beacons, clear GIFs, pixel tags and single-pixel GIFs) that permit us to, for example, to count users who have visited those pages or opened an e-mail and for other website-related statistics. Beacons in e-mail marketing campaigns allow us to track your responses and your interests in our content, offerings and web pages. You may use the tools in your device to disable these technologies as well.
* **Third-party cookies.** Our service providers, advertising partners, and ad networks may also use cookies and beacons to collect and share information about your activities on our Websites and on other websites and applications. In addition, third parties that are unaffiliated with us may also collect information about you, including tracking your browsing history, when you use our Websites. We do not have control over these third-party collection practices.

You may wish to restrict the use of cookies or completely prevent them from being set. Most browsers provide for ways to control cookie behavior, such as the length of time they are stored. If you disable cookies, please be aware that some of the features of our Websites may not function correctly. To find out more on how to manage and delete cookies, visit [www.aboutcookies.org](https://www.aboutcookies.org/). For more details on your choices regarding use of your web browsing activity for interest-based advertising, you may visit the following sites:

* <http://networkadvertising.org/>
* <http://optout.aboutads.info/>
* <http://youradchoices.com/>

 **YOUR CHOICES**We provide you the ability to exercise certain controls and choices regarding our collection, use, storage, and sharing of your personal information. Depending on where you reside, and in accordance with applicable law, your controls and choices may include the following:

* **Right to Know.** You have the right to request: (1) the categories of personal information we have collected about and from you in the 12 months prior to the date of your request; (2) the categories of sources from which we have collected that personal information; (3) the business or commercial purpose for collecting or sharing that personal information; (4) the categories of third parties with whom we have shared that personal information; and (5) the specific pieces of personal information collected during that timeframe.
* **Right to Delete.** You have a right to request that we delete your personal information, subject to certain exceptions such as to complete the transaction for which the information was collected, detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, identify and repair errors, to comply with a legal obligation, and for other recognized legal reasons.
* **Right to Correct.** You may request that we correct certain personal information you have provided to us (i.e., new address, different name, etc.).
* **Process To Submit A Request.** To submit a request to know, delete, or correct, you may e-mail us at info@vantrustre.com with the subject line “PRIVACY REQUEST” or call 816-569-1441. You may also designate an authorized agent to submit a request on your behalf. We will confirm receipt of, and respond to your requests as soon as possible, and in conformance with all applicable law.
* **Verification Method.** In order to ensure that changes are not made to your personal information without your authorization, and to protect against your personal information being disclosed to unauthorized parties, we will seek to verify your identity before responding to your request by using a reasonable method based on the type, sensitivity, and value of the personal information requested, including but not limited to matching the identifying information provided in your request with the information we have on file about you. Depending on the sensitivity of the personal information requested, we may also utilize more stringent verification methods to verify your identity, including but not limited to requesting additional information from you and/or requiring you to sign a declaration under penalty of perjury.
* **Right to Anti-Discrimination.** We will not discriminate against you for exercising your rights set forth under this section.

You can learn more about your choices, and exercise these controls and choices, by contacting us at 816-569-1441.

**CHILDREN**
Our Websites are not intended for children under the age of 18. This includes any links to other websites that we provide for our convenience. We don’t knowingly collect personal information from children for any reason.

**CALIFORNIA DIRECT MARKETING (SHINE THE LIGHT)**
If you are a California resident, you may request information regarding the disclosure of your information by us to third parties for their direct marketing purposes. Please note that our response to these requests will be duplicative of and more limited than our response to Right to Know requests (described above). To make such a request, please send an email to info@vantrustre.com with the subject line, “CALIFORNIA SHINE THE LIGHT REQUEST,” or write us at:

**CALIFORNIA SHINE THE LIGHT REQUEST**
**VanTrust Real Estate, LLC**
**Attn: Privacy**
**4900 Main St, Ste 400, Kansas City, MO 64112**

**INTERNATIONAL JURISDICTIONS**
Our Websites are hosted and offered in the United States of America (US), and are subject to applicable US federal, state, and local law. If you are accessing and/or using the Websites from another country, please be advised that you may be transferring your personal information to us in the US, and you consent to that transfer and use of your personal information in accordance with this Privacy Policy.

You also agree to abide by the applicable laws of applicable US federal, state, and local laws concerning your access and/or use of the Websites, and any additional agreements with us. If your access and/or use of our Websites is subject to the laws or regulations of any other jurisdiction regarding the use of the Internet, including the collection, use, or disclosure of personal information, and any such use and/or access would be unlawful in said jurisdiction, you may not access and/or use the Websites.

**CHANGES TO OUR PRIVACY POLICY**
We may change this Privacy Policy from time to time. Any and all changes to this Privacy Policy will be reflected on this page, and where appropriate provided in person or by another electronic method. Material changes to this Privacy Policy will be posted here, and may be provided via e-mail or another method, as appropriate under applicable law. The last updated date will be stated at the top of this Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you. You should regularly check this page for any changes to this Privacy Policy.

**CONTACT US**
Email: info@vantrustre.com
Phone: 816-569-1441