

PARAGON PRIVACY POLICY

Effective Date: September 18th 2018

Paragon Spaces, LLC and our affiliates (collectively, “Paragon,” “we,” “us,” “our,” or “Paragon Family”) cares about your privacy. We are committed to maintaining your trust by protecting your Personal Information. This Privacy Policy (“Policy”) describes how the Paragon Family collects, uses, and discloses your Personal Information in connection with the use of our websites (“Website Services”), applications (“apps”), or other service that refers to or links to the Policy, as well as any offline products, programs, courses, and services (collectively our “Services”). Before you use our services, please read this Policy in its entirety, which helps you make informed decisions about your relationship with us.

1. INTRODUCTION

1.1. Personal Information. “Personal Information” is data that relates to you and can, either on its own or in combination with other information, identify you as an individual. Personal Information does not include data that has been aggregated or made anonymous such that you can no longer be identified using any means reasonably available to us.

1.2. Our Services. The Services referenced in this Policy include the Services provided by the Paragon Family. You can read more about how Personal Information is used by each Service, by clicking on the name of the Paragon Family company whose Services, websites, or applications you use below.

1.3. References to “you.” In this Policy, “you” means anyone who uses our Services, websites, or applications.

1.4. Authoritative Version. When the text of this Policy is available in multiple languages, the English version is the authoritative version, except where prohibited by applicable law.

2. INFORMATION COLLECTED.

2.1. Personal Information We Collect. The Personal Information that we collect and how we use that information depends on your relationship with us and the requirements of applicable law as described below. We collect information:

2.1.1. that you provide to us directly;

2.1.2. that your employer, broker, host, parent or guardian provides to us;

2.1.3. about your devices and their location, and your use of our Services, including through cookies, pixels, web beacons, logs and other Internet technologies. For more information about these technologies, please see our Cookie Policy;

2.1.4. that we obtain from other sources; and

2.1.5. If you opt in to certain features, we obtain geo-location data, photos and information about your contacts.

2.2. INFORMATION COLLECTED ABOUT YOU. Paragon and our family of companies request different types of Personal Information from you, depending on the Services you use and

your relationship with us. We may collect the following categories of information, depending on the Services that you use:

2.2.1. **Contact Information**, including your name, mailing address, phone number, email address and other information that enables us to contact you;

2.2.2. **Verification Information**, including a photo ID or government issued identification, and date of birth;

2.2.3. **Professional Information**, including your company name, title, role, team and other information about your profession;

2.2.4. **Payment Information**, including your credit or debit card details, bank account information, and payment or other information required when you make a purchase;

2.2.5. **Intellectual Property**, including trademarks, logos, and other intellectual property that you own;

2.2.6. **Other Personal Information**, including instant messenger and social media screen names, usernames and passwords, relationship to emergency point of contact, vehicle identification, and other details such as the purpose of your visit, and data or files that you input, upload or store with the Services, such as search queries that you submit, and documents that you upload to the Services. We will also process personal data included in content and information that you add to your member network or other community profile.

2.2.7. **Email Calendar Information**. We integrate with your corporate email calendar (Gmail or Microsoft Outlook) and collect data regarding the conference rooms you book.

2.2.8. **Office Preferences**. You provide us with your office preferences, such as temperature, fan speed, desk and chair height, desk location, phone booth, beverage, snack, and other preferences related to the Services.

2.2.9. **Communications**. We also collect and store communications, such as e-mail, SMS, Slack, requests made through Amazon Echo or similar technology, calendar invitations, any other information you choose to share with us — including your photos, videos, blog entries, interests, hobbies, lifestyle choices, and groups with which you are affiliated — and that you send or receive using the Services.

2.3. INFORMATION COLLECTED FROM SOURCES OTHER THAN YOU

2.3.1. **Social Media**. Paragon collects Personal Information to enable you to use online social media resources, including use of our Member Network (MENA). If you register or log into your account through a third-party social media service, we will have access to some of your third-party account information from that service, such as your name and other information in that account, as authorized in your settings on that service. You have the ability to disable the connection between our Services and your third-party account at any time.

2.3.2. **Information from Third-Party Sources**. We obtain Personal Information about you from your company, organization, broker, parent, or guardian; or from your host if you are a visitor or guest to one of our spaces. We also may receive information about you from publicly and commercially available sources and other third parties as permitted by law. We

combine this information with Personal Information or other information that we receive from or about you, where necessary to provide the Services you requested.

2.3.3. Google Analytics. We use a tool called “Google Analytics” to collect information about use of our Website Services (e.g., Google Analytics collects information such as how often users visit the Website Services, what pages they visit when they do so, and what other sites they used prior to coming to the Website Services). Google Analytics collects only the IP address assigned to you on the date that you visit the Website Services, rather than your name or other identifying information. The information collected through the use of Google Analytics is not combined with your Personal Information. Learn more about how Google Analytics collects and processes data and opt-out options at <http://www.google.com/policies/privacy/partners/>.

2.3.4. Information Used for Interest Based Advertising. Through the Website Services, we allow third-party advertising partners to set tracking tools (e.g., cookies) to collect anonymous, non-Personal Information regarding your activities (e.g., your IP address or page(s) visited). We also share such information that we have collected with third-party advertising partners. These advertising partners use this information (and similar information collected from other websites) to deliver future targeted advertisements to you when you visit non-Paragon related websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising.” For more information on these types of tracking tools, please see our Cookie Policy.

2.3.5. Mobile Computing. We provide websites and online resources that are specifically designed to be compatible and used on mobile computing devices. Mobile versions of the Services require you to log in with an account. In such cases, information about use of each mobile version of the website may be associated with user accounts. In addition, Paragon enables you to download an application, widget or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools transmit Personal Information to Paragon to enable you to access your user accounts and to enable Paragon to track use of these tools. Some of these tools enable you to e-mail reports and other information from the tool.

2.4. ANONYMOUS AND AGGREGATED INFORMATION. We also collect and/or generate anonymized and aggregated information from your use of the Services. We use anonymized and aggregated information various ways, including to measure your interest in and use of portions or features of the Services. Anonymized or aggregated information is not Personal Information.

3. USE OF PERSONAL INFORMATION. How we use your Personal Information depends on your relationship with us. In general, we use your Personal Information to:

3.1. provide you with our Services, in order to meet our contractual obligations to you or your company;

3.2. contact you about our Services, promotions, and sweepstakes. contact you about our Services, promotions, and sweepstakes. We generally rely on our legitimate interests in marketing our Services to you, whether on our own websites or on third party websites, and in providing these promotions or sweepstakes, where permitted by applicable law. We ensure that we do not use your Personal Information in ways you would not expect by allowing you to opt out of receiving all such communications (unless they are solely related to the provision of our Services

to you and have no marketing element) and, where required by applicable law, we will not send any such messages without your prior consent; and

3.3. comply with our legal obligations. Among other things, we use Personal Information to comply with financial reporting obligations, or court orders, warrants, or subpoenas in accordance with applicable law.

4. SHARING OF PERSONAL INFORMATION. We disclose your Personal Information in limited circumstances to the Paragon Family, our community, our service providers and advertisers, and other end users, in order to provide our Services and to improve ways of working in our community. We do this for the purposes outlined above. Where required by applicable law, we will only share your Personal Information with particular third parties with your consent.

4.1. Among the Paragon Family of companies. Our Services are provided by Paragon and its family of companies depending on where you are located and the Services that you use. The Paragon Family uses your information in accordance with this Policy.

4.2. Our Community. Our Services include online and offline member communities, forums and networks that allow you to share information and connect with others. We make this possible by creating profiles for members or permitting members to create their own profiles. Such a profile contains your name and the name of your company or other organization and other information you provide. Depending on the Services you use, this profile might be created automatically and is accessible to other members of the forum or network, some of which include all Paragon members. You can supplement your profile by adding additional information about yourself and your company or organization, and by posting content and comments. You can share your profile with a broader audience (e.g., via social media). Please note that we cannot control the actions of other users of the Services with whom you share information.

4.3. Service Providers. We rely on third-party service providers to perform a variety of services on our behalf, and we take steps to ensure that they act only in line with our instructions and on our behalf, or otherwise to use Personal Information as described in this Policy.

4.4. Other Parties When Required by Law and as Necessary to Provide and Protect Our Services. There may be instances when we disclose your Personal Information to other parties:

4.4.1. to provide you with the Services that you or your company or organization request, or to auditors or consultants;

4.4.2. to comply with the law or respond to legal process or a request for cooperation by a government entity or law enforcement;

4.4.3. to detect, limit, and prevent fraud, or verify and enforce compliance with the policies governing our Services; or

4.4.4. to protect our rights, property, and safety or that of any of our respective Paragon Family of companies, business partners, members or employees; and

4.4.5. where otherwise required by law. We share Personal Information in this way either to comply with legal obligations to which we are subject, or to meet our legitimate interests in protecting our business, including from fraud and legal claims.

4.4.6. **Other Parties in Connection with a Corporate Transaction.** We disclose or share your information in the event that we purchase, sell, finance, transfer, or acquire all or a portion of a business or assets, such as in connection with a merger, or in the event of a bankruptcy reorganization or liquidation.

4.4.7. **Third-Party Advertising Partners.** We share limited Personal Information with third parties that serve our advertising online, so that they can display our adverts to individuals who may find them most relevant. We share this information in order to meet our legitimate interests in advertising our products effectively. We make sure that we only share limited Personal Information for this purpose, and only to trusted partners that are restricted in how they can use your Personal Information.

4.4.8. **Other Third-Party Partners, With Your Consent.** We may request your consent to share Personal Information about you with certain third parties so that they can provide you with special offers, promotional materials, and other materials that may be of interest to you. With your consent, we also use and publicize your name, likeness and other personal characteristics and private information for advertising, promotion and other commercial and business purposes.

4.4.9. **Research / Survey Solicitations.** From time to time, we will provide your Personal Information to our service providers to perform research (online and offline) via surveys on our behalf. Participation is voluntary, and we will use the information that we collect for research and reporting purposes, and to help us to improve the quality of our Services. We use the survey responses to determine the effectiveness of our Services, including the quality of our communications and our advertising and/or promotional activities. If you participate in a survey, your responses will be used along with other participants' responses.

5. THIRD PARTIES THAT PROVIDE CONTENT OR FUNCTIONALITY ON OUR SERVICES. We partner with certain third parties to collect, analyze, and use some of the Personal Information described in this Policy. For example:

5.1. Third-parties that provide features and functionality on the Services by means of plug-ins. Even if you do not click on or interact with social networking services or other plug-ins, they collect information about you, such as your IP address and the pages that you view.

5.2. Advertising providers help us and our advertisers provide advertisements on our Services or elsewhere, including advertisements that are targeted based on your online behavior, and analytics companies help us measure and evaluate the usage of our services.

5.3. Other content providers offer products and services on our Services and operate contests, sweepstakes, or surveys on our Services.

5.4. Cookies and Other Internet Technologies. These third parties collect or receive certain information about your use of our Services, including through the use of cookies, web beacons, and Internet technologies. Check out our Cookie Policy for more information.

5.4.1. Some of these companies participate in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising.

5.4.2. **Public Forums.** Our Sites may make member networks, chat rooms, forums, and/or other groups available to the users. Remember that anyone can read, collect, or use your postings on a network or forum or in a chat room or group and, we cannot be responsible for any unauthorized third party's use of information that you disclose online.

5.4.3. **Social Media.** We are active on social media (e.g., Twitter, Facebook, etc.) and share information, images, and video with the public through unaffiliated external social media sites. We encourage you to read their policies. Remember that the social media sites are public, which means that anyone can see your posts, and your posts may even show up in search engine results.

5.4.3.1. While we will not edit comments, we may delete a comment from our page on a social media site if it, for example, does not relate to the post, promotes a commercial product or service, uses obscene, threatening, or harassing language, or if it is a personal attack or hate speech that targets or disparages any ethnic, racial, age, or religious group (or other legally protected group), or if it advocates illegal activity or violates copyright laws.

6. RIGHTS IN YOUR INFORMATION: ACCESS, RECTIFICATION, ERASURE AND RESTRICTION. We value your rights to your data. In accordance with applicable law, you may have the right to: (1) request confirmation of whether we store, use or share any of your Personal Information; (2) obtain access to or a copy of your Personal Information; (3) receive an electronic copy of Personal Information that you have provided to us, or ask us to send that information to another company (the "right of data portability"); (4) restrict our uses of your Personal Information or, as described above, object to those uses; (5) seek correction of inaccurate, untrue or incomplete Personal Information; or (6) request erasure of Personal Information held about you by Paragon, subject to certain exceptions prescribed by law. If you would like to exercise any of these rights, please contact us at the e-mail or physical addresses set out below. We will process such requests in accordance with local laws. To protect your privacy, Paragon will take steps to verify your identity before granting access or making any changes to your Personal Information.

7. OPT-OUT. You have the right to opt-out of certain uses and disclosures of your Personal Information, as set out in this Policy, and in specific circumstances, for example related to direct marketing.

7.1. Opt-Out in General. Where you have consented to Paragon's use of "sensitive" Personal Information (e.g., Personal Information relating to your health, religious or philosophical beliefs, or biometric information which is used to uniquely identify you) ("Sensitive Personal Information"), you are able withdraw that consent at any time.

7.1.1. Prior to disclosing Sensitive Personal Information to a third party or Processing Sensitive Data for a purpose other than its original purpose or the purpose authorized subsequently by the Data Subject, Paragon will endeavor to obtain your explicit consent (opt-in). Where your consent for the Processing of Personal Information is otherwise required by law or contract, Paragon will comply with the law or contract.

7.2. Email and Telephone Communications

7.2.1. Opting-Out of Marketing Communications. We provide a means to unsubscribe in our marketing-related email communications. Note that we will continue to send transaction-related emails regarding products or services that you have requested following an unsubscribe. We may also need to send you certain communications regarding operation

and administration of the Services, and you will not be able to opt out of those communications, e.g., communications regarding updates to our Terms of Use or this Policy. If you no longer desire to be contacted by us, you must terminate your relationship with Paragon and can no longer use our Services.

7.2.2. Collaboration. We do not sell your Personal Information to third parties for their direct marketing purposes. We may partner with other organizations to run events or programs. The Personal Information and other information that you provide to sign up or participate in that event or program will be available to that organization, and you may receive emails or other communications from it after the event. Please refer to that organization's privacy policy for information on how to opt-out of its communications.

7.2.3. Text Messages. We may send you SMS text messages related to our Services or transactions. You can opt-out of these messages at any time by replying STOP.

7.3. Compliance with Digital Advertising Alliance. Should Paragon engage in interest-based advertising, it will endeavor to comply with the cross-industry Self-Regulatory Program for Online Behavioral Advertising as managed by the Digital Advertising Alliance (DAA) (<http://aboutads.info>), as applicable. As part of this service, Paragon's online advertisements may sometimes be delivered with icons that help Individuals understand how their data are being used and provide options to restrict that use. To opt-out of internet-based advertising by all DAA-participating companies, please visit <http://www.aboutads.info/choices/>

8. RETENTION. Paragon will retain your Personal Information for as long as you have a relationship with us, and for a period after your relationship with us has ended. When determining how long this retention period will last, we take into account the length of time Personal Information is required to:

- 8.1.** Continue to develop, tailor, upgrade and improve our Services;
- 8.2.** Maintain business records for analysis and/or audit purposes;
- 8.3.** Comply with record retention requirements under the law;
- 8.4.** Defend or bring any existing or potential legal claims; or
- 8.5.** Address any complaints regarding the services.

9. INFORMATION SECURITY. The security of all Personal Information provided to Paragon is important to us. Paragon takes reasonable steps endeavoring to use appropriate technical or organizational measures to protect your Personal Information, including against unauthorized or unlawful Processing and accidental loss, destruction or damage. Unfortunately, no data transmission over the Internet or storage of information can be guaranteed to be 100% secure. As a result, while Paragon strives to protect your Personal Information, we cannot ensure or warrant the security of any information that you transmit to Paragon, and you do so at your own risk. As such, we ask that you help us be safer together by implementing your own security controls, such as a strong password, not sharing your credentials or badge with others, logging out when you leave your desk, and other security best practices.

10. AUTOMATED PROCESSING. We do not currently use your Personal Information in such a way that automated decisions are made about you without any human input. In the future, we may use automated processes to help us determine your eligibility for new services, alternate space, or other business-related opportunities. In such cases, if and as applicable, and to the extent required by applicable law, we will endeavor to implement suitable safeguards, including, for example, an opportunity for you to

request human intervention, express your point of view, contest any decisions made, and request that we restrict the use of your Personal Information for the purposes of these automated decisions.

11. OTHER RIGHTS AND IMPORTANT INFORMATION

11.1. CCTV. Paragon’s buildings may have CCTV installed to meet our legitimate business interests in protecting the safety of Paragon’s employees, members, and guests and their property, as well as to improve our products and services, and to analyze how users navigate and use our spaces. These recordings may be accessed by Paragon and Members with a need to know. These recordings may be shared with competent authorities in accordance with applicable laws, if required. The recordings are retained for a limited period of time but may be kept longer for the investigation of an incident or when competent authorities request us to retain them.

11.2. LINKS. We display advertisements and other content from third parties or partners that links to third party websites that we do not own or operate. We provide links to these third-party sites as a convenience to you. They are not intended as an endorsement of or referral to the linked services. The linked services are subject to their separate and independent privacy statements, notices, and terms. We cannot control or be held responsible for third parties’ privacy practices and content. Please read their privacy policies to find out how they collect and process your Personal Information prior to submitting any Personal Information. The collection, use, and disclosure of your Personal Information will be subject to the privacy policies of the third party and not this Policy. We are not responsible for the data collection, privacy, and information sharing policies and procedures or content of such third-party websites.

11.3. CHANGES TO THIS POLICY IN THE FUTURE. Any information that is collected via the Services is covered by the Policy in effect at the time such information is collected. We reserve the right to change, modify, add, or remove portions of this Policy at any time and at our sole discretion.

If we make any material changes to this Policy, we will notify you of those changes by posting them on the Services or by sending you an email or other notification, as required by applicable law, and we will update the “Effective Date” below to indicate when those changes will become effective.

We encourage you to review this Policy periodically to remain informed of how we use and protect your information, and to be aware of any policy changes. Your continued relationship with us after the posting or notice of any amended Policy shall constitute your agreement to be bound by any such changes. Any changes to this Policy take effect immediately after being posted or otherwise provided by Paragon.

11.4. QUESTIONS OR COMMENTS

If you have any questions or comments regarding our Policy, please contact us at:

Paragon Spaces, LLC,
1461 Tamarind Ave.,
Hollywood, CA 90028

Paragon will address your concerns and attempt to resolve any privacy issues in a timely manner.

Sensitive Information. Because email communications are not always secure, please do not include credit card or other Sensitive Personal Information (e.g., racial or ethnic origin, religion, health, or the like) in your emails to us.