

Internet Privacy Policy (Dwellworks)

Our Commitment to Privacy

Your privacy is important to us. To better protect your privacy, we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our homepage and web site footer, plus at every point where personal information may be requested. This policy supplements other materials you may have received or will receive from Dwellworks, LLC. ("Dwellworks"). If any conflicts should occur between this policy and those materials, the provisions of the other materials apply.

Dwellworks has further committed to refer unresolved Privacy Shield complaints to AAA, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit [ICDR/AAA](#) for more information or to file a complaint. The services of AAA are provided at no cost to you.

Sites Covered by this Policy

This privacy policy applies to the following sites: www.dwellworks.com, www.dwellworkspropertyadvisors.com, www.dwellworksculturecloud.com, www.irishrelo.com, ark-shanghai.com, www.dwellworksliving.com and www.dwellworksdirect.com owned and operated by Dwellworks. This Privacy Policy describes how Dwellworks collects and uses the personal information you provide on our websites. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

Participation and Compliance

This Dwellworks, LLC Privacy Policy (the "Policy") for Privacy Shield applies to the following entities:

- + Dwellworks, LLC;
- + Dwellworks Destination Services, LLC;
- + Dwellworks Property Advising Services, Inc;
- + Dwellworks Property Advisors, LLC; and
- + Dwellworks Residential Services, LLC

(together referred to as "Dwellworks").

Such entities together with its current and future affiliates and subsidiaries (such as Dwellworks, LLC.), participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Dwellworks is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy

Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List: <https://www.privacyshield.gov/list>.

Dwellworks is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Dwellworks complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Dwellworks is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Dwellworks may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Under certain conditions, more fully described on the Privacy Shield website: <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

Dwellworks complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Dwellworks has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Data Subject Rights

To exercise any of the following rights that you have under the European Union General Data Protection Regulation ("GDPR") contact the Dwellworks Chief Privacy Officer who is Hank Roth at: hank.roth@dwellworks.com. We will be appointing an EU Data Protection Officer as recommended by the GDPR in the near future and will revise this document to provide that information.

Your Personal Information is protected by legal rights, which include your rights to:

- + Request access to your Personal Information (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
- + Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- + Request erasure of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us

continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- + Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- + Request restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
- + Request the transfer of your Personal Information to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- + Withdraw consent at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you would like to review, correct, update, suppress, object to, or restrict the processing of your Personal Information or request a copy of Personal Information about you, you may contact us by sending us an email at hank.roth@dwelworks.com or jim.smith@dwelworks.com.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as

reasonably practicable without undue delay and in any event within one (1) month of receiving a request.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the applicable supervisory authority in the EU depending on your location in the EU.

The Information We Collect

When you visit our websites or interact with our organization, we will not collect any personal information about you unless you decide to provide information to us. Dwellworks does not share, sell, rent, or trade Personal Identifiable Information (“PII”) with third parties for their promotional purposes.

This notice applies to all information collected or submitted on Dwellworks websites. On some pages, you can order services, make requests, and register to receive materials.

You are not required to provide this information, however the services we can offer you may be limited without it. We use this information solely as required to respond to your particular request and to improve both the usability of our site and our user support procedures. The types of personal information we may collect at these pages include:

- + Name
- + Company name
- + Title
- + Address
- + E-mail address
- + Telephone number
- + Services requested
- + Moving locations and moving date(s)

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do not link this automatically collected data to other information we collect about you.

Collection of 3rd party PII

The types of 3rd party PII we collect are Name, Company name, Title, Address, E-mail address, Telephone number, Services requested, moving locations and moving date(s). We only use this information for purposes such as delivering services and if you opt in

receiving marketing information and materials. If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please contact us at Compliance@dwelworks.com.

The Way We Use Information

We use the information you provide about yourself when placing an order to complete that order. We use return e-mail addresses to answer the e-mail we receive. We use aggregate information to better design our website, diagnose problems with our Web server, and administer our website. For example, we may gather information telling us that X number of individuals visited a certain area on our website and Z number of individuals filled out a contact form.

Customer Testimonials/Comments/Reviews

We post customer testimonials/comments/reviews on our website which may contain personal information. We do obtain the customer's consent via email prior to posting the testimonial to post their name along with their testimonial. If you wish to update or delete your testimonial, you can contact us here.

Our Commitment to Data Security

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. We hold our employees accountable for maintaining the privacy and integrity of our customers' information. We provide ongoing training programs that are designed to keep our employees informed of our Privacy Principles.

No method of transmission over the Internet, or method of electronic storage, is 100% secure, therefore, we cannot guarantee its absolute security. If you have any questions about the security of your personal information, you can contact us at:

Compliance@dwelworks.com.

Protecting the Privacy of the Very Young Is Especially Important

For that reason, we never collect or maintain information on our website from those we actually know are under the age of 13, and no part of our website is structured to attract anyone under the age of 13. In the event Dwellworks learns that a registrant is under the age of 13, we will take steps to ensure that that registrant's information is deleted from our database. We encourage parents to actively participate in their children's activities on the Internet and to educate children on the safe use of the Web.

Consent

At Dwellworks, we believe that our visitors own their personal information. We will always give our registrants a choice regarding how the personal information they provide us may be used. For example, during the process of helping our transferees and assignees relocate to new areas, Dwellworks may share personal information with carefully selected third-party companies, organizations and government agencies in

order to facilitate an easy relocation process and give our customers access to local resources they might find helpful in their new location.

Our customers will always have the opportunity to opt in or out of any data collection or distribution, although some services we provide may be limited. If you do not want us to share your personal information with third party service providers, contact us at compliance@dwelworks.com.

We may provide your personal information to companies that provide services to help us with our business activities. These companies are authorized to use your personal information *only as necessary to provide* these services.

Disclosure

Dwellworks will not willfully share the personal information collected from our customers without their consent. We will share your personal information with third parties only in the ways that are described in this Privacy Policy. The only exception to this policy is when we are required to do so by law, such as to respond to lawful requests by public authorities, including to meet national security or law enforcement requirements, comply with a subpoena, or similar legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

If Dwellworks is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Accountability

Dwellworks takes our responsibility to manage your information and protect your privacy very seriously. We have made the commitment to have our Privacy Policies and Practices audited by independent organizations.

Because we are committed to your privacy and value your trust we have provided a link to our [Privacy Notice](#).

How to Correct or Update Your Information

Upon request Dwellworks will provide you with information about whether we hold any of your personal information. You can access, correct factual errors and update your personal information by contacting Compliance@dwelworks.com.

To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections. We will respond to your request to access within 30 days. If you wish to request that we no longer use your information to provide you services, contact us at Compliance@dwelworks.com.

Retention of Personal Information

We will retain your personal information for as long as your file is active, or as needed to fulfill the purposes for which it was collected. We will retain and use your personal information as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements.

Third-Party Sites

To better serve you, we often provide links to other websites that may be of interest to you. We have no control over and are not responsible for the content or the operators of such sites. Therefore, this Privacy Policy will not apply to information you may provide on such sites. You should contact the operators of any website if you are concerned about the privacy of the information that may be collected when you use the site.

Social Media Widgets

Our website includes Social Media Features, such as the Facebook Like button and Widgets, such as the Share This button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

Cookies/Tracking Technologies

Technologies such as cookies, beacons, tags, scripts or similar technologies are used by Dwellworks for analytics or service providers. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies for analytics. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

We may partner with a third party to either display advertising on our Web site or to manage our advertising on their sites and other sites. Our third-party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests.

Dwellworks does not control the actions of third parties. Please note that opting out does not opt you out of being served ads. You will continue to receive generic ads.

How to Contact Us

Dwellworks has appointed a Chief Privacy Officer. Should you have other questions or concerns about this Privacy Policy or this website, send us an e-mail at Compliance@Dwellworks.com, or write us at 1317 Euclid Ave., Cleveland, OH 44115 Attention: Hank Roth, Chief Privacy Officer. For security purposes, please do not include confidential information, such as a social security number or order-tracking number, in any email or other correspondence. We will be appointing an EU Data Protection Officer as recommended by the GDPR in the near future and will revise this document to provide that information.

Changes in This Privacy Policy

If we decide to change our privacy policy, we will post those changes to this Privacy Policy, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If we make material changes to this Privacy Policy, we will notify you here, by email, or by means of a notice on our home page, prior to the change becoming effective.