

Terra Holdings, LLC

California Notice at Collection and Privacy Policy

This California Notice at Collection and Privacy Policy (“**CA Privacy Policy**”) applies solely to California residents and describes their rights under the California Consumer Protection Act, as amended (“CCPA”), and other California laws. Note, the Company does not directly operate in California, and this Policy applies only to the extent that we collect personal information or personally identifiable information (collectively, “**Personal Information**”) about you in the context of your interactions with the Brown Harris Stevens brokerage and management companies and the Halstead Management Company (collectively, the “**Company**”) in other jurisdictions.

Personal Information

The following chart describes Personal Information that has or may have been collected by the Company during the past 12 months. While the Company does not sell any Personal Information, as “sell” is defined under the CCPA, it may be disclosed to others, including its “**Service Providers**”, which include partnership advertisers, providers of internet services, data analytics, operating systems and platforms, cloud storage, data providers, web hosts, payment processors, email distributors, financial and accounting servicers, internet providers, cyber security advisors, law firms, and customer relationship management providers. The Company obtains Personal Information from its real estate agents, from you directly through forms, from surveys and your use of Company Services, and from its Service Providers. The Company’s “**Housing Clients**” include i. sellers, landlords, buyers, and tenants for whom the Company provides brokerage services and the boards of the buildings in which buyers and tenants seek admission, and ii. buildings for whom the Company provides management services, including without limitation housing fee collections, construction supervision, HR functions, tax reporting, and medical and building insurance placement. In the course of providing services to Housing Clients, the Company provides Personal Information to Service Providers, unions, medical service and insurance providers, law firms, and governmental entities. If the Company collects additional forms of Personal Information, or uses it for purposes that are not compatible with those described below, it will amend this CA Privacy Policy, so please check this site periodically. **We do not build profiles or sell Personal Information.**

General Personal Information

Do We collect?	Categories of Personal Information	Purposes for Collection and, in some instances, Disclosure	Third Parties to whom Information May be Disclosed
Yes	A. Identifiers: For example, a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, agent license number and licensing state; date of birth; debit card information; credit card information; Cookie Session Identifier; or other similar identifiers	<ul style="list-style-type: none">• To fulfill or meet the reason for which the information is provided• Servicing transactions and accounts• Undertaking internal research for technological development	<ul style="list-style-type: none">• Service providers• Housing clients• Governmental entities
Yes	B. Personal Information Categories from Cal. Civ. Code § 1798.80(e):	<ul style="list-style-type: none">• To fulfill or meet the reason for which the	<ul style="list-style-type: none">• Service providers

Do We collect?	Categories of Personal Information	Purposes for Collection and, in some instances, Disclosure	Third Parties to whom Information May be Disclosed
	For example, name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information	<p>information is provided</p> <ul style="list-style-type: none"> • Servicing transactions and accounts • Undertaking internal research for technological development 	<ul style="list-style-type: none"> • Governmental entities • Housing clients
Yes	C. Characteristics of CA or Federal Protected Classifications: race, religion, national origin), age (40 and over), gender, sexual orientation, medical condition, pregnancy, familial status, disability, veteran status, or genetic information	<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided 	<ul style="list-style-type: none"> • Governmental agencies • Service Providers
Yes	D. Commercial Information: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided • Servicing transactions and accounts • Undertaking internal research for technological development 	<ul style="list-style-type: none"> • Service Providers
Yes	E. Biometric Information: For example, photos, videos, logins indicating a physical presence	N/A but may assist Housing Clients who maintain security footage	<ul style="list-style-type: none"> • assist Housing Clients in use of security footage • governmental agencies
Yes	F. Internet or Other Similar Network Activity: browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement, or Zoom data for employees	<ul style="list-style-type: none"> • For the purposes for which the information was provided • Undertaking internal research for technological development 	<ul style="list-style-type: none"> • Service Providers

Do We collect?	Categories of Personal Information	Purposes for Collection and, in some instances, Disclosure	Third Parties to whom Information May be Disclosed
Yes	G. Geolocation Data: information to locate a device's physical location	<ul style="list-style-type: none"> • For our internal operation purposes • Fraud and security detection • Debugging to identify and repair errors • Undertaking internal research for technological development 	<ul style="list-style-type: none"> • Service Providers
Yes	H. Sensory or Surveillance Data: For example, audio, electronic, visual, thermal, olfactory, or similar information that can be linked or associated with a particular consumer or household	<ul style="list-style-type: none"> • Maintaining security systems to detect fraud, misuse of facilities, illegal behavior and conserve energy 	<ul style="list-style-type: none"> • Governmental authorities • Service Providers
Yes	I. Professional or Employment-Related Information: For example, compensation, evaluations, performance reviews, personnel files and current and past job history.	<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided 	<ul style="list-style-type: none"> • Governmental agencies • Housing Clients
Yes	J. Education	<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided 	<ul style="list-style-type: none"> • Housing Clients

Sensitive Personal Information

Do We collect?	Categories of Sensitive Personal Information	Purposes for Collection	Third Parties to Whom Information may be Disclosed
Yes	Social Security Number, Driver's License, State Identification Card, or Passport Number	<ul style="list-style-type: none"> • To perform services you request • Satisfy legal requirements • To perform business needs such as verifying customer information, 	<ul style="list-style-type: none"> • Service Providers • Governmental Agencies • Housing Clients

Do We collect?	Categories of Sensitive Personal Information	Purposes for Collection	Third Parties to Whom Information may be Disclosed
		processing payments	
Yes	Account log-in, financial account, debit card, or credit card number when provided with any required security or access code, password, or credentials allowing access to an account	<ul style="list-style-type: none"> To perform services, including payment processing, maintenance of accounts 	<ul style="list-style-type: none"> Service Providers
Yes	Precise geolocation	<ul style="list-style-type: none"> To perform and enhance services To investigate security incidents 	<ul style="list-style-type: none"> Service Providers Governmental Agencies
Yes	Racial or ethnic origin, religious or philosophical beliefs, or union membership	<ul style="list-style-type: none"> Maintain information on union membership To perform services for employees 	<ul style="list-style-type: none"> Housing Clients Unions
No	Contents of a consumer's mail, email, and text messages (unless we are the intended recipient of the communication)	N/A	N/A
No	Genetic data	N/A	N/A
Yes	Biometric information for the purpose of unique identification	<ul style="list-style-type: none"> Maintaining security systems to detect fraud, misuse of facilities, illegal behavior and conserve energy 	<ul style="list-style-type: none"> Service Providers Housing Clients Governmental agencies
Yes	Health information	<ul style="list-style-type: none"> To perform services for employees 	<ul style="list-style-type: none"> Housing Clients Employee medical service providers

Do We collect?	Categories of Sensitive Personal Information	Purposes for Collection	Third Parties to Whom Information may be Disclosed
No	Information concerning sex life or sexual orientation	N/A	N/A

Please note that the Company does not collect any Sensitive Personal Information for the purpose of inferring characteristics about any consumer. Therefore, we are not required to include a “Limit My Sensitive Personal Information” link on our Website.

Data Retention

We will retain your Personal Information and documentation for the retention period required by law, and may occasionally retain it beyond the required period, if deemed to be reasonably necessary to fulfill an ongoing business need (for example, account recovery), or to comply with applicable tax, legal or accounting requirements. To determine the appropriate retention period for your Personal Information, we consider various factors, such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your Personal Information; and applicable legal requirements.

When we dispose of Personal Information, we use reasonable procedures designed to erase or render it unreadable (for example, shredding documents and wiping electronic media).

Note that Personal Information does not include publicly available information that is lawfully made available from government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience; or de-identified or aggregated consumer information.

California Privacy Rights: Shine the Light Law

California’s Shine the Light law (Cal. Civ. Code § 1798.83) permits users of the Services that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request or opt-out, please send an e-mail to privacy@terraholdings.com.

California Privacy Rights: Online Privacy Protection Act (“CalOPPA”)

California’s Online Privacy Protection Act (Bus. & Prof. Code § 22575) requires operators of a commercial website or online service that collect personally identifiable information as defined under CalOPPA (“PII”) about California consumers through the Internet to satisfy certain requirements. If you want to review and request changes to the handling of your PII, collected through the Site (as defined in the Privacy Policy) or our Services, please send an email to privacy@terraholdings.com.

California Privacy Rights: California Consumer Privacy Act of 2018 (“CCPA”) as amended by the California Privacy Rights Act (“CPRA”)

As defined under the CCPA and further revised by the CPRA, if you are a California “Consumer,” you have certain rights with respect to the collection, use, transfer, retention, selling, sharing, and processing of your Personal Information. To exercise any of the rights below, please contact us directly at

privacy@terraholdings.com. Only you or your Authorized Agent (as defined herein), may make a verifiable consumer request related to your Personal Information.

We collect Personal Information from our real estate agents and Service Providers, as well as from you directly.

California Consumer Rights

California consumers have the following rights, subject to applicable exceptions:

- The right to request information about Personal Information collected about you;
- The right to request disclosure of categories of Personal Information we disclose;
- The right to access Personal Information in a portable format;
- The right to opt out of the sharing or selling of Personal Information to a third party;
- The right to correct your inaccurate Personal Information;
- The right to request deletion of Personal Information; and
- The right to not to be discriminated against for exercising your privacy rights.

To exercise any of these rights, contact us at privacy@terraholdings.com. You may have to validate your identity and California residency status and/or the authority of the person exercising these rights on your behalf. You may request this information twice in a 12-month period. You may also click on the unsubscribe link on any commercial email you receive from the Company.

You have the right to request that the Company and our service providers not sell or share certain Personal Information that the Company has collected from you to a third party, except for information required by law, or necessary to conduct certain business purposes, such as HR, tax reporting and other functions. You can exercise that right or request an opt out at any time by contacting privacy@terraholdings.com. We do not sell your PII.

If you have any questions or concerns, please contact us at privacy@terraholdings.com.

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