

PRIVACY POLICY

Last updated: March 23, 2023

Shangri-La Development (SLD) ("We"/"Us"/"Our") respects the privacy of consumers, including Users of our website and those who contact us ("User"/"You"). This Privacy Policy describes Our policies and procedures on the collection, use, and disclosure of Your information when You visit our website (<u>www.vacampusbuilding208.com</u>/"Site") and tells You about Your privacy rights and how the law protects You. We use Your Personal data to provide and improve Our service. By using the website, You agree to the collection and use of information in accordance with this Privacy Policy. *This Privacy Policy has been created with the help of the TermsFeed Privacy Policy Generator*.

Collecting and Using Your Personal Data

Types of Data Collected

We may collect personal information about You in a variety of ways. The personal information we may collect on the Site or when You communicate with us includes the following categories of personal information.

PERSONAL DATA

While using Our Site, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- First name and last name
- Company name
- Title
- Email address
- Phone number
- Usage Data

USAGE DATA

Usage Data is collected automatically when using the Site. Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Site that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Site by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data. We may also collect information that Your browser sends whenever You visit our Site or when You access the Site by or through a mobile device.



TRACKING TECHNOLOGIES AND COOKIES

We use Cookies and similar tracking technologies to track the activity on Our Site and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Site. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Site. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Site may use Cookies.
- Web Beacons. Certain sections of our Site and our communications may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. You can learn more about cookies on <u>TermsFeed website article</u>. We may use both Session and Persistent Cookies for the purposes set out below:

- Necessary/Essential Cookies. (Session) These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraud. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.
- **Functionality Cookies.** (*Persistent*) These Cookies allow us to remember choices You make when You use the Website, such as remembering provided details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

Use of Your Personal Data

Having accurate information about you permits us to provide you with the best experience. The Company may use Personal Data for the following purposes:

- To provide and maintain our Site: including to monitor the usage of our Site.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, regarding updates or informative communications.
- **To provide You**: with news and general information about other services and events related to those that you have already enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.
- For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Site users is among the assets transferred.
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Site, services, marketing and your experience.



Disclosure of Your Personal Data

We may share Your personal information in the following situations:

- By Law or Other Legal Requirements: We may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency). We may also disclose Your Personal Data in good faith that such action is necessary to: comply with a legal obligation, protect and defend the rights or property of the Company, prevent or investigate possible wrongdoing in connection with the Site, protect the personal safety of Users of the Site or the public, or to protect against legal liability.
- With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Site, to contact You, or to manage our communications. Use of technologies related to third-party service providers may make You subject to additional policies under their operation. Our contact form is provided via **Smartsheet**, and You can access their <u>Privacy Policy on their website</u>.
- For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners, or other companies that We control or that are under common control with Us.
- With business partners: We may share Your information with Our business partners to offer You certain products, services or promotions.
- With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- With Your consent: We may disclose Your personal information for any other purpose with Your consent.

Retention, Transfer, and Removal of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Your information is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to and maintained on—computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction. Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You. Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.



Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Personal Data You provide, We cannot guarantee its absolute security.

Children's Privacy

Our Site does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

Links to Other Websites

Our Site may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page and updating the "Last Updated" date. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are advised to review this Privacy Policy periodically for any changes. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site or provision of personal information after the date such revised Privacy Policy is posted.

Contact Us

The Company referred to in this policy is Shangri-La Development, 660 S Figueroa Street, Suite 1888, Los Angeles, CA 90017, and Website refers to VA Campus Building 208, accessible from https://www.vacampusbuilding208.com/.

If you have any questions about this Privacy Policy, You can contact us by visiting this page on our website: <u>https://www.vacampusbuilding208.com/home/#contact</u>.