PERSONAL INFORMATION THAT MAY BE	WHY WE NEED IT	WHO DO WE SHARE IT WITH AND WHY
<u>COLLECTED</u>		
Property Related Information	Our CRE Mortgage Banking Business may use some Personal Information as part of the	Our CRE Mortgage Banking Business may require us to share some Personal
Tenant Name and Contact Information	process to confirm other property-related financial, operational, and business	Information with other parties to a potential loan/capital transaction. For example,
(including phone, address, email, social networking	information used in the loan and other capital formation decision-making processes.	there may be other lenders and capital sources who are working with us on a
info)	We may also receive business records from our borrowers and potential borrowers that	transaction, who will need to receive all relevant information about a property, the
Lease Guarantor Name and Contact Information	contain such information, even though it may not be needed or used in these decision-	borrower and related parties. Also, the loan origination process requires lenders and
(including phone, address, email, social networking	making processes. We may also use this information for internal business purposes.	capital providers to hire subject matter experts to provide expert analytical, reporting
info)	Once received, all information becomes part of our official business records and	and loan closing services. Some of these third-party vendors include property
Unit Number and Occupancy Information	generally cannot be deleted from our systems. We maintain all such information in	inspectors, physical and environmental engineers, appraisers, zoning experts, attorneys,
 Tenant/Guarantor Proof of Identity and Signatures 	accordance with our various legal, contractual, regulatory, record retention and other	credit/financial/background reporting services, rating agencies, underwriting services,
(drivers' license, passport, and other I.D forms)	business compliance requirements and obligations.	and other third-party support vendors and independent contractors. In the course of
 Rent, Security Deposit and Other Charges and 	Our CRE Loan Servicing Business may use some Personal Information as part of the	their activities, these third parties may come into possession of Personal Information.
Deposits	process to service loans that are owned by us and other lenders. We use this	Such information is typically provided/received pursuant to confidentiality obligations and use restrictions and becomes part of their official business records, which generally
Rent Payment History	- information to ensure that the borrower and related parties are performing and will	cannot be deleted. We may also be compelled to provide Personal Information in
Tenant Lease Application Information	continue to perform their obligations as required under the loan documents. We may	response to government, quasi-government and legal proceeding requests.
Tenant Lease Documents and Information	also use this information to help identify potential issues with a loan in the future, and	response to government, quasi government and regal proceeding requests.
Tenant/Guarantor Social Security Numbers	to operate the property if there is an event of default under a loan, followed by a	Our CRE Loan Servicing Business may require us to share some Personal Information
Tenant/Guarantor Credit-Financial Information and	foreclosure or similar action or proceeding. We may also use this information for	with other parties to a loan/capital transaction. For example, there may be other
Search Authorizations and Results	internal business purposes. We may also receive business records from our borrowers	lenders, capital sources, investors, trustees, and servicers who own or service a loan or
Tenant/Guarantor Banking Information	and related parties that contain Personal Information, even though it may not be	other capital transaction, who will need to receive all relevant information about a
Tenant/Guarantor Employment & Income History	needed or used in our loan servicing activities. Once received, all information becomes	property, the borrower and related parties. Also, the loan servicing and management
Proof of Insurance	part of our official business records and generally cannot be deleted from our systems.	processes may require us and these other parties to hire subject matter experts and
Housing Assistance Information	We maintain all such information in accordance with our various legal, contractual,	other service providers. Some of these third-party vendors include property inspectors,
Copies of Communications	regulatory, record retention and other business compliance requirements and	physical and environmental engineers, appraisers, zoning experts, attorneys,
Emergency Contact Information	obligations.	credit/financial/background reporting services, rating agencies, underwriting services,
Automobile, License Plate and Related Information		and other third-party support vendors and independent contractors. In the course of
Names, Contact Information, Business Terms and	Our CRE Brokerage/Investment Sales Business may use some Personal Information as	their activities, these third parties may come into possession of Personal Information.
Records for Product & Service Providers and Other	part of the process to help owners sell CRE properties and/or purchasers buy CRE	Such information is typically provided/received pursuant to confidentiality obligations
Vendors and Business Relationships	properties. We use this information to prepare marketing and due diligence materials	and use restrictions and becomes part of their official business records, which generally
(including phone, address, email, social networking	to be used in the sale of a property and to help buyers make their purchase decisions. We may also use this information for internal business purposes. We may also receive	cannot be deleted. We may also be compelled to provide Personal Information in response to government, quasi-government and legal proceeding requests.
info)		response to government, quasi-government and legal proceeding requests.
Photographs of/at the Property	business records from the parties to a transaction that contain Personal Information, even though it may not be needed or used in our CRE brokerage or investment sales	Our CRE Brokerage/Investment Sales Business may require us to share some Personal
Reports, Licenses, Permits, Inspections and Other	activities. Once received, all information becomes part of our official business records	Information with other parties to a purchase/sale transaction. For example, the buyers
Legal Compliance Documents that Contain Some of	and generally cannot be deleted from our systems. We maintain all such information in	and sellers, and their respective real estate brokers, lenders, investors, other capital
the Above Information	accordance with our various legal, contractual, regulatory, record retention and other	sources, and third-party vendors will need to receive all relevant information about a
	business compliance requirements and obligations.	property and the transaction. Some of the other third-party vendors may include
		property inspectors, physical and environmental engineers, appraisers, zoning experts,
		attorneys, credit/financial/background reporting services, underwriting services, and





General	Business Records		
•	Contact Information for Clients, Prospective Clients and Other Business Contacts (including phone, address, email, and other personal info)	General Business Operations may result in us receiving Personal Information that does not directly support any specific line of business. Under such circumstances, we use such information for the purposes provided, which may include internal business purposes. Once received and stored on our systems, this information becomes part of our official business records and generally cannot be deleted. In any event, we use and maintain all such information in accordance with our various legal, contractual, regulatory, record retention and other business compliance requirements and obligations.	<u>General Business Operations</u> may result in us sharing Personal Information with outside vendors and independent contractors that help support our general business operations. For example, we may provide such information to attorneys, accountants, banks, payroll processing companies, talent recruiters, technology support companies, landlords, insurance carriers, and other types of product and services providers that typically provide support to companies and operations like ours. Such information is typically provided pursuant to confidentiality obligations and use restrictions and becomes part of their official business records, which generally cannot be deleted. We may also be compelled to provide Personal Information in response to government, quasi-government and legal proceeding requests.
•	Names, Contact Information, Banking Information, Benefits and Employment Terms and Records for Employees (including phone, address, email, and other personal info, which may include information about family members)		
•	Names, Contact Information, Banking Information, Benefits and Engagement Terms and Other Business Records for Independent Contractors (including phone, address, email, and other personal info, which may include information about family members)		
•	Names, Contact Information, Banking Information, Business Terms and Records for Product & Service Providers and Other Vendors and Business Relationships (including phone, address, email, and other personal info)		
•	Credit-Financial Information, Proof of Identity, Employment and Residency History, Search Authorizations and Results, Social Security and Tax ID Numbers, Banking Information, Government License/Approval Information, Emergency Contact and Family Information for All of the Above		

