

# Block One Property Holder, LP Privacy Policy

Effective Date: [January 1, 2020]

Last Reviewed on: [January 1, 2020]

Block One Property Holder, LP (“**Block One Property Holder**,” “**we**,” “**us**” or “**our**”) is committed to safeguarding the privacy of information entrusted to us. The privacy principles and procedures set forth below (“**Privacy Policy**”) are intended to tell you how we may collect, use, and disclose information. This Privacy Policy applies to all Personal Information (defined below) that Block One Property Holder collects, both online and offline. We collect data about users of [[WWW.MIRASF.COM](http://WWW.MIRASF.COM)] and any other websites, blogs, mobile sites, applications, and other interactive features operated now and in the future by or for Block One Property Holder (collectively the “**Website**”) The individuals about whom we collect data are referred to as “**you**” and “**your**” in this Privacy Policy.

By accessing or using our Website, you signify that you agree with all of the terms of this Privacy Policy and the Terms of Use [[https://mirasf.com/public/uploads/pdf/MIRA\\_Privacy\\_Policy.pdf](https://mirasf.com/public/uploads/pdf/MIRA_Privacy_Policy.pdf)]. If you do not agree to the Privacy Policy and Terms of Use, you must not access or use the Website.

We may change this Privacy Policy at any time. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Website. The date this Privacy Policy was last reviewed is identified at the top of the page. By accessing or using the Website following any such changes, you signify that you accept the revised Privacy Policy.

## Information We Collect

We collect several types of information, including information:

- that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“**Personal Information**”);
- That is about you but individually does not identify you (see Other Information We May Collect); and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

The information we collect is obtained from the following categories of sources:

- Directly from You – We may collect information you provide to us, or that you authorize a third party to provide to us, including when you register on our Website, subscribe to receive alerts, newsletters, or event announcements; when you communicate with us by phone, e-mail or in person; when you register for or attend an event; and when you apply for a job or otherwise communicate with us.
- Indirectly from You – We may use data collection technologies to collect information about you (see Automatic Data Collection Technologies below).

We may use the Personal Information we have collected for the business purposes identified below. **Block One Property Holder does not sell, rent, or otherwise make Personal Information commercially available to any third party. Block One Property Holder does not share your Personal Information with unaffiliated third parties for promotional or advertising purposes.** Except as provided below, we do not disclose your personal information to third parties. When we disclose Personal Information for a business purpose without your express consent, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

Within the last twelve (12) months, we have collected the following categories of Personal Information:

Type of Personal Information Collected	Source of Collection	Business Purpose for Collection and Use	Business Purpose for Third-Party Disclosure
<p><b>A. Identifiers.</b> A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.</p>	Directly from You	To respond to your request for information or to provide a requested service.	To contractors or service providers we have retained in connection with operating the Website and the services we provide.
<p><b>B. Personal Information Categories Listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b> A 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, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p>	Directly from you	To respond to your request for information or to provide a requested service.	To contractors or service providers we have retained in connection with operating the Website and the services we provide.
<p><b>C. Internet or other similar network activity.</b> Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.</p>	Indirectly from you	To provide, support, personalize, and develop our Website, products, and services.	Not disclosed.

## Other Information We Collect

Our website and online resources also collect other basic information about you that does not directly identify you, but which may correspond with you or a particular device (“Other Information”). We use this information to learn more about how our Website is used and to improve or enhance the Website. We also use this information to customize the way information on our Website is presented to you. This information includes the IP address of your device; information regarding the pages on our Website that you have visited; time you spent on our Website; date and time of your visits; information about your web browser, device, and operating system; and location of the website visited just before our Website.

## How We May Use and Disclose Other Information

Please note that we may use and disclose Other Information for any purpose, except where we are required to treat Other Information as Personal Information under applicable law. In those situations, we may use and disclose Other Information for the purposes for which we use and disclose Personal Information.

In some instances, we may combine Other Information with Personal Information (such as combining your name with your company and title). If we combine any Other Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is so combined.

## Automatic Collection Technologies

We do not use automatic collection technologies to collect Personal Information. However, we and our third-party service providers may collect Other Information using the following automatic collection technologies:

- **Log Files:** Most Internet browsers transmit certain information to websites that you visit, such as your IP address, device type, screen resolution, operating system version, and internet browser type and version. This information is gathered automatically and stored in log files. We use this information to ensure that the Website functions properly.
- **Cookies:** Cookies are text files, containing small amounts of information, which are downloaded to your browsing device (such as a computer or smartphone) when you visit a website. Cookies allow us to recognize your browsing device and preferences and generally help to improve your online experience, as well as to provide us with anonymous information to check the usefulness of, and make improvements to, our Website. Cookies may be placed on your computer and/or mobile device by both us and by third parties with whom we have a relationship, such as web analytics services. You may refuse cookies by activating the setting on your browser. However, if you select this setting, you may not have the same user experience. To learn more about how to manage cookies, visit [www.allaboutcookies.org/manage-cookies/](http://www.allaboutcookies.org/manage-cookies/) (please note that this website is not connected to us and we are not responsible for its content).
- **Web Beacons and Pixel Tags:** We may utilize a technology called a “web beacon” or “pixel tag”. We may use web beacons to help determine which email messages sent by us were opened and whether a message was acted upon. Web beacons also help analyze the effectiveness of websites by measuring the number of visitors to a site or how many visitors clicked on key elements of a site.

- **Third Party Analytics:** We also use automated devices and applications, such as Google Analytics (more info <https://support.google.com/analytics/answer/6004245?hl=en-GB>) to evaluate the use of our Website. We use these tools to gather non-personal data about users to help us improve our services and user experiences. These analytics providers may use cookies and other technologies to perform their services, and may combine the information they collect about you on our Website with other information they have collected for their own purposes. This Privacy Policy does not cover such uses of data by third parties.
- **Do Not Track Signals:** We currently do not change our tracking processes in response to Do Not Track settings in your web browser, since at this time we do not work with nor share any Personal Information with companies that engage in targeted advertising.=. For more information about Do Not Track signals, visit <https://allaboutdnt.com> (this website is not connected to us and we are not responsible for its content).

## **Your Choices About How We Use and Disclose Your Information**

- **General.** You have certain choices about your Personal Information. Where you have consented to the processing of your personal information, you may withdraw that consent at any time and prevent further processing by contacting us as described below. Even if you opt out, we may still collect and use Other Information that is not Personal Information regarding your activities on our Website and for other legal purposes as described above.
- **Email and Telephone Communications.** If you do not wish to completely opt out of our use of your Personal Information, but no longer wish to receive marketing-related emails from us on a going-forward basis, you may opt out of receiving these marketing-related emails by following the unsubscribe instructions in any such message. We aim to comply with such request(s) as soon as reasonably practicable. Please note that if you do opt out of receiving marketing-related emails from us, we may still send you administrative messages.  
We process requests to be placed on do-not-mail, do-not-phone and do-not-contact lists as required by applicable law.
- **Modify Your Information.** You may request to review, correct, update, suppress or otherwise modify any Personal Information that you have previously provided to us through the Website, or object to the use of such Personal Information by us. [You may exercise these rights by logging on to the “[Contact Preferences](#)” section of our Website.] For your protection, we will only implement requests with respect to the Personal Information associated with the particular individual if we can verify the identity of that individual (see *Exercising Access, Data Portability, and Deletion Rights* below for verification process). We aim to comply with requests as soon as reasonably practicable.
- **Cookies and Interest-Based Advertising.** You may stop or restrict the placement of cookies on your device or remove them by adjusting your preferences as your browser or device permits. The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy, at [www.aboutads.info/choices/](http://www.aboutads.info/choices/), <https://youradchoices.ca/choices/>, [www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp), and <http://www.youronlinechoices.eu/>. Alternatively, for some devices you may use your device’s platform controls in your settings to exercise choice.

Please note you must separately opt out in each browser and on each device. Advertisements on third party websites that contain the AdChoices link may have been directed to you based on information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners' use of this information for interest-based advertising purposes.

### **Additional Privacy Rights**

If you are a resident of California or any state with similar laws, you may be covered by the California Consumer Privacy Act (“CCPA”; California Civil Code sections 1798.100 *et seq.*) or the similar laws of other states and may have the following additional rights regarding our use of your Personal Information:

#### ***Access to Specific Information and Data Portability Rights***

You have the right to request that Block One Property Holder disclose the following information about our data collection for the previous twelve (12) months: (a) the categories of Personal Information we have collected about you; (b) the specific pieces of Personal Information we have collected about you; (c) the categories of sources from which your Personal Information was collected; (d) the categories of third parties with whom we share your Personal Information; and (e) the business or commercial purpose for collecting or disclosing your Personal Information. You may make a request for this information no more than twice in a twelve (12) month period. Please see Exercising Access, Data Portability, and Deletion Rights for information about how we verify your request.

#### ***Deletion Request Rights***

You have the right to request that Block One Property Holder delete any of your Personal Information that we have collected from you and retained, subject to certain exceptions (“**Deletion Request**”). Please see *Exercising Access, Data Portability, and Deletion Rights* for information about to we verify your Deletion Request. Once we have verified your Deletion Request, we will delete (and direct our service providers to delete) the Personal Information identified in your Deletion Request, except for Personal Information that is exempted by statute or regulation.

#### ***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability, and deletion rights described above, please submit a request to us by either:

- Calling us at [415-839-8383]. [Under the proposed regulations, a business must offer a toll-free number for consumers to make these requests.]
- Visiting [WWW.MIRASF.COM] [Provide a web form for Access and Deletion Requests]
- E-mailing your request with the information required below to: [info@mirasf.com]

Any request to exercise your rights under this Privacy Policy must contain sufficient information for us to verify your identity. We ask that you provide two data points of information that we will match to the information we know about you in order to verify your request for the general

categories of Personal Information that we have collected about you or your request to delete your Personal Information. We will only disclose the specific pieces of information that we have collected about you after matching at least three data points to the information we know about you and obtaining a signed declaration under penalty of perjury confirming the request.

If you chose to make a request by e-mail, please provide your full name and your e-mail address, home address, and the phone number we would have in our records so that we are able to verify that you are the person about whom we collected Personal Information. Your e-mail should also describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. **Do not send your social security number, credit card number, passport number, or other identification card number** when you submit your request. The Personal Information you provide with your request will only be used to verify your identity. You may use an authorized agent to submit requests under this policy on your behalf. However, we may request copies of written authorization to such agent, and may also request that you independently verify the information contained in the request in order to confirm your identity.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity (and that of an authorized agent) and confirm the Personal Information relates to you.

You may also make a request on behalf of your minor child.

### ***Response Timing and Format***

We will confirm receipt of the request within ten (10) days of its receipt. We endeavor to respond to requests within forty-five (45) days of receipt. If we require more time (up to an additional forty-five (45) days), we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding receipt of the request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We cannot and will not discriminate against any person, including with respect to the quality or cost of our services, on the basis of any request with respect to your Personal Information.

You may have similar rights under California Civil Code Section 1798.83, relating to our disclosure of certain Personal Information to third parties, which are also covered by our compliance with the requirements of this section and our obligations under the CCPA.

## **Third-Party Sites**

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site to which this Website contains a link. Please read the terms, conditions and policies of such third-party sites before accessing or using such sites. The inclusion of a link on the Website does not imply any endorsement of the linked site by us or by our affiliates.

## **Security**

To prevent unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss, and to ensure the correct use of information, we employ physical, technical and administrative procedures to safeguard this Website and the personal information we collect. All of our employees and any third parties we employ to process your personal information are obliged to respect its confidentiality. However, transmission of information through the internet is not secure. Although we seek to protect your information as described above, we cannot guarantee the security of any information you transmit to the website or to us, and you transmit such information at your own risk. Please do not send sensitive or confidential information to us by email or by any other means in connection with the Website. If you have reason to believe that your communications with us have been compromised in any way, please immediately notify us of the problem by contacting us as provided in the “**Contacting Us**” section below.

## **Retention Period**

We will retain your Personal Information and Other Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

## **Use Of Site By Minors**

The Website is not directed to individuals under the age of sixteen (16). No one under age 16 may provide any information to or on the Website. We do not knowingly collect Personal Information from children under 16. If you are under 16, do not use or provide any information on this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [info@mirasf.com].

## **Governing Law and Jurisdiction**

All matters relating to the Website and the Privacy Policy, and any dispute or claim arising therefrom or related thereto, shall be governed by and construed in accordance with the internal laws of the State of California without giving effect to any choice or conflict of law provision or rule (whether of the State of California or any other jurisdiction). This Website is operated, in whole or in part, from the United States. By using this Website, regardless of where you live in the world, you consent to have any Personal Information you provide through this Website transferred to and processed in the United States, and allow Block One Property Holder to use and collect your Personal Information in accordance with this

Privacy Policy. Text on this Website may be published in languages other than English. In all instances, the English language version of any text, including this Privacy Policy, controls the legal impact and interpretation of this Website and its use.

### **Cross-Border Transfer**

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using our Website you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those in your country.

### **Sensitive Information**

We ask that you not send us, and you not disclose, any sensitive information (e.g., Social Security numbers, credit card or other payment card information, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership), or other information you consider to be confidential, on or through the Website or otherwise to us.

### **Contacting Us**

If you have any questions about this Privacy Policy, please contact us by e-mail at [info@mirasf.com], by phone at [415-839-8383], or at the address below.

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