



# Sentinel Real Estate Corporation Online Privacy Notice

Effective Date: 08/07/2019

We at Sentinel Real Estate Corporation (“Sentinel,” “us” or “we”) respect your concerns about privacy. This Online Privacy Notice, which applies to <https://www.sentinelcorp.com> (the “Site”), describes the types of personal information we collect through the Site, how we use the information, with whom we share it and the choices available to users of the Site regarding our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

## **Information We Obtain**

The types of personal information we may obtain through the Site includes:

- contact information (such as name and email address) that you provide; and
- other personal information found in content you provide, including email communications submitted through our contact form.

The information we collect in this manner includes IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken and dates and times of activity. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of the Site. For more information on deleting or controlling cookies we recommend [www.allAboutCookies.org](http://www.allAboutCookies.org).

We may use third-party web analytics services on our Site, such as Google Analytics. Such services help us analyze how visitors use the Site. The information collected for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these service providers. To learn more about opting out of these activities, click below:

- For Google Analytics: <https://www.google.com/policies/privacy/>

The providers of third-party plug-ins on the Site, such as Google Maps, may use automated means to collect information regarding your use of the Site and your interactions with the plug-ins. This information is subject to the privacy policies or notices of the plug-in providers and is not subject to this Online Privacy Notice. We are not responsible for these providers’ information practices.

## **How We Use the Information We Obtain**

We may use the information described above to:

- communicate with you and respond to your inquiries;

- operate, evaluate and improve our business (including developing new products and services; enhancing and improving our products and services; managing our communications; analyzing our products, services and communications; and performing accounting, auditing and other internal functions);
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities;
- comply with and enforce applicable legal requirements, relevant industry standards and our policies; and
- for our legitimate business purposes, including marketing our services to you.

In addition, we may use information collected through automated means (cookies and/or similar technologies) for the purposes set forth above, including (i) customizing your visit to our Site, (ii) analyzing the manner in which you interact with our Site, and (iii) managing our Site and other aspects of our business. We also use information to help diagnose technical and service problems, administer our Site and identify users of our Site.

We may use the information we obtain in other ways for which we provide specific notice at the time of collection.

Neither we nor any third parties on our Site obtain personal information about our visitors' online activities, over time and across third-party websites. Our Site is not designed to respond to "do not track" signals from browsers.

### **Information We Share**

We do not sell or otherwise disclose the personal information we collect about you on this Site, except as described in this Online Privacy Notice. We may share personal information with service providers who perform services on our behalf based on our instructions, such as updating or addressing issues with the Site. These service providers are not authorized by us to use or disclose the information, except as necessary to perform services on our behalf or comply with legal requirements. We also may share certain personal information with our affiliates for the purposes described in this Online Privacy Notice.

We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government entities, and (iii) when we believe disclosure is necessary or appropriate to prevent harm or financial loss, to enforce our rights and policies, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, spin-off, divestiture, dissolution or liquidation). Following such a transaction, you may contact the entity to which we transferred your personal data with any inquiries concerning the use of that information.

### **Transfer of Personal Information to Other Countries**

For the avoidance of doubt, the owner and operator of the Site is Sentinel Real Estate Corporation, with headquarters located in the United States. Our servers may be located in North America or parts of the world other than the country in which you are located when using the Site or in which you reside.

We may transfer the personal information we collect about you to recipients in countries other than the country in which you originally provided it or in which we are located. These countries may not have the same data protection laws as the country in which you provided the information. When we transfer your information to recipients in other countries, we will protect that information as described in this Online Privacy Notice and will comply with applicable legal requirements.

## **How We Protect Personal Information**

We maintain appropriate administrative, technical and physical safeguards designed to protect the personal information you provide through the Site against accidental, unlawful or unauthorized access, disclosure or use.

While we cannot ensure or guarantee that unlawful or unauthorized access, disclosure or use of your information will never occur, we use all reasonable efforts to prevent it in light of the nature of information supplied.

You should bear in mind that submission of information over the internet, such as sending an email, is never entirely secure. We cannot guarantee the security of information you submit via the Site while it is in transit over the internet and any such submission is at your own risk.

If you use a shared computer or a computer in a public place, it is advisable to close your browser when you have finished your user session to help ensure others do not access your personal information.

## **Links To Other Websites**

These websites and apps may operate independently from us. Linked sites and applications may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites or applications are not owned or controlled by us, we are not responsible for their content, any use of the websites or applications, or the privacy practices of the websites or applications.

## **Updates To Our Online Privacy Notice**

This Online Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post the updated version on this Site and indicate at the top of the notice when it was most recently updated.

## **How To Contact Us**

If you have any questions or comments about this Online Privacy Notice, or if you would like us to update information we have about you or your preferences, please email us at [websiteadmin@sentinelcorp.com](mailto:websiteadmin@sentinelcorp.com).

You also may write to us at:

Sentinel Real Estate Corporation  
Website Administration  
1251 Avenue of the Americas  
New York, NY 10020

## **Residents of California: Your Rights and Choices**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by Sentinel to third parties for the third parties' direct marketing purposes. To make such a request, please send an email to [websiteadmin@sentinelcorp.com](mailto:websiteadmin@sentinelcorp.com) or write us at the address stated above.

Pursuant to California Civil Code Section 1798.83(c)(2), Sentinel does not share your personal information with third parties for those parties' direct marketing use, unless you elect that we do so.

## **Residents of the European Union: Your Rights and Choices**

If you are a resident of the European Union or provide personal information through this Site while located in the European Union, we offer you certain choices in connection with the personal information we collect from you on this Site. To update your preferences and consents, ask us to remove your information from our mailing lists or submit a request, please contact us as indicated in the “How To Contact Us” section of this Online Privacy Notice.

Users in the European Union may have the right under certain circumstances:

- to be provided with a copy of your personal data held by us;
- to request the rectification or erasure of your personal data held by us;
- to request that we cease processing your data;
- to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
- to request that your data be transferred to a third party; and
- where provided by law, to withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal information, and we will apply your preferences going forward.

We may use your data for marketing purposes or if we intend to disclose your information to any third party for such purposes by checking certain boxes on the forms, we use to collect your data. You can also object to receiving further marketing at any time without detriment. We will inform you prior to collecting or using your Personal Information for any purpose not mentioned in this Privacy Notice

You can also exercise the rights listed above at any time by contacting us at [websiteadmin@sentinelcorp.com](mailto:websiteadmin@sentinelcorp.com).

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority (to locate your data protection authority see [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.html](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html)).