

PRIVACY POLICY

FinanzButik and its affiliates and subsidiaries, including Finanz Butik, LLC, Finanz Butik Global Corp: Finanz Butik Global Corporation, Inbest JB LLC, Inbest Management LLC, Inbest Services LLC, Jorge Aguirre Bauer PLLC, LUA Host, Finanz Butik Development LLC, Inbest FE LP, Inbest FGP LLC., Inbest FBP LLC., Inbest FD LP., Inbest FSPV1 LLC. Inbest FB Group RE Holding LLC., Finanz Butik Capital Management, Finanz Butik LLC. Finanz Butik Management LLC, and Inbest PN LLC. ("FinanzButik," "we," "our," and/or "us") value the privacy of individuals who use our website, application, and related services (collectively, our "Services"). This privacy policy (the "Privacy Policy") explains how we collect, use, and share information from users of our Services ("Users"). By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our Terms of Use.

The Gramm-Leach-Bliley Act ("GLBA") is also known as the Financial Modernization Act of 1999. Please review this notice to understand how we collect, share and protect information under the GLBA here.

Mandatory Arbitration Provision

Any disputes arising out of or relating to this Privacy Policy, FinanzButik's data security policies, or any of the terms and conditions between the customer and FinanzButik shall be resolved exclusively through mandatory binding arbitration. The arbitration shall be conducted under the Commercial Arbitration Rules of the American Arbitration Association (AAA). The venue and jurisdiction for any arbitration proceedings shall be in the state of Florida, Miami Dade County, and the arbitration shall be governed by the laws of the State of Florida. By agreeing to this Privacy Policy, the customer consents to personal jurisdiction in Florida for the purposes of enforcing this provision.

NOTICE TO CALIFORNIA RESIDENTS

If you are a California resident, please also review our California Resident Privacy Notice for more information about the types of personal information we collect and disclose, as well as how to exercise your rights under California law.

Information We Collect

We may collect a variety of information from or about you or your devices from various sources, as described below.

Information You Provide to Us



Registration. When you register to use our Services, we ask you for your name, email address, phone number, username/password, and accreditation status. We may also ask for documentation to verify your accreditation status. This may include information necessary for us to comply with U.S. and International sanctions regimes, Anti-Money Laundering (AML) requirements, or in



some cases, Know Your Customer (KYC) rules as applicable. We also may use this information to validate or verify you when you log back into your account, or when you authorize us to use funds on your behalf.

Participation/Investment. Once registered to use our Services, we collect additional information from you to create your profile. For example, we ask you for your phone number, company and company address, job title, industry, date of birth, citizenship or nationality, government issued identification, or documents necessary to establish authorization to engage in the transactions.

Investment Account. If you create an investment account through our Services, we ask you for account type (e.g. individual, joint, IRA), legal investing account name, taxpayer ID number or Social Security Number or similar identification for foreign investors, account address, ACH information or SWIFT account number, accreditation verification, and additional investment account members. We may also collect information on the location of that account for foreign investments.

Payment Information. If you create an account with us, we ask you for additional information in order to make payments to you or receive funds from you. This may include things like your account number, type, location, routing and ACH information, credit card information, tax information (including applicable taxpayer or entity identification number), withholding information (if applicable), and similar information. If you link an existing or new cryptocurrency brokerage account or wallet with us for the purpose of sending or receiving payments, we may also collect similar information about that account or wallet.

Communications. If you contact us directly, we may receive additional information about you. For example, when you contact our customer support team, we will receive your name, email address, the contents of a message or attachments that you may send to us, and other information you choose to provide. If you participate in one of our surveys, we may receive information about you relating to the subject matter of the survey. If you subscribe to our newsletter, then we will collect certain information from you, such as your email address. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services. We also track when you use our app or visit your portal, for both security purposes and to ensure that we provide you the best services.

Verify Your Identity. For security purposes, we may request additional information from you to verify your identity. For example, we may collect your social security number, date of birth, address, and copy of your government-issued identification. We may also use two-factor authentication to protect your login information.

Compliance With Law. We may use the information you provide to ensure that we comply with all laws and regulations concerning our business, including OFAC and International sanctions regimes, tax, investment regulations, real estate regulation and accounting requirements.

Funding and Distribution Information. If you invest through our marketplace, we will collect your bank account information to transfer money to your investments and fulfill your distributions and capital returns.



Information We Collect When You Use Our Services

Device Information. We receive information about the device and software you use to access our Services, including IP address (which may provide us with your general location information), web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

Usage Information. To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, your browsing history, the searches you conduct, people you follow, investments you make, your comments, any content you post, clickstream data, advertising interactions, and the dates and times of your visits.

Information from Cookies and Similar Technologies. We and our third-party partners may collect information using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services. Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

Information We Receive from Third Parties

Credit Reporting Agencies. If you are a sponsor of an offering or register for an investment account through our Services, we may receive information about you from credit reporting agencies to comply with applicable laws and industry standards, such as Know Your Business or Know Your Customer (KYC) and Anti-Money Laundering (AML). For example, we may receive your pass/fail status of KYC and AML. We may also receive information from credit reporting agencies to verify your bank accounts and other ownership information.

Registration Information. You can log in to the Services using third party credentials such as LinkedIn or Google. These services will authenticate your identity and provide you the option to share certain personal information with us, such as your name and email address to pre-populate our registration form.

Other third parties. We may receive additional information about you from third parties such as data or marketing partners and combine it with other information we have about you. For example, we may receive your name, e-mail address, and general location information derived from your IP address from marketing partners to learn more about demand for current and prospective users.

Sharing With Third Parties. We offer a wide variety of services on our portal or through our app which are provided by third parties. This may include services like legal services, accounting services, settlement or closing services, title or other insurance services, incorporation or registered agent services, interior design and decorating services, and "lifestyle" services which may include recommendations for schools,



shopping, entertainment, sports or other events in the neighborhood of property in which you may choose to invest. When you request these services, you will be providing your information to these third parties directly, subject to their data privacy and data security policies. FinanzButik is not responsible for these entities' privacy and data security policies and programs.

Third Party Service Providers. FinanzButik engages with various third-party vendors and suppliers to process data on its behalf or to assist in complying with its legal and regulatory obligations. These third parties include CRM providers, cloud service providers, Software as a Service (SaaS) providers, other data processors, as well as FinanzButik's own lawyers, accountants, and consultants. These third parties may have access to customer data as necessary to process the data for the purposes of assisting FinanzButik. In all applicable cases, these third parties will execute a Data Processing Agreement (DPA) which indicates that the data will be processed solely for the purpose of assisting FinanzButik and its clients and customers. By engaging with these third-party vendors and suppliers, FinanzButik ensures that all data processing activities are carried out in compliance with applicable data protection laws and regulations, maintaining the appropriate levels of data privacy and security.

No Guarantees of Privacy or Security. While FinanzButik strives to protect customer data and maintain privacy and security standards, it is important to acknowledge that no method of data transmission or storage is completely secure. Therefore, FinanzButik cannot guarantee absolute privacy or absolute security. In the event of a data breach, FinanzButik will comply with all applicable data breach and notice disclosure laws and regulations to ensure affected individuals are appropriately informed and reasonable measures are taken to mitigate any potential harm.

Customers Responsible for their Credentials. Customers are responsible for maintaining the security of their own accounts, including their user IDs and passwords. FinanzButik is not liable for any loss, theft, compromise, reuse, or spoofing of customer credentials. Customers are advised to use strong, unique passwords and to keep their account information confidential to prevent unauthorized access to their accounts.

How We Use the Information We Collect

We use the information we collect:

- To provide, maintain, improve, and enhance our Services;
- To personalize your experience on our Services such as by providing tailored content and recommendations;
- To understand and analyze how you use our Services and develop new products, services, features, and functionality;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;
- To provide you with investment opportunities to match your individual investment goals;
- To facilitate offers on behalf of other Users or third parties.
- For marketing and advertising purposes, such as developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you;



- To generate anonymized, aggregate data containing only de-identified, non-personal information that we may use to publish reports;
- To send you text messages and push notifications;
- To facilitate transactions and payments;
- To find and prevent fraud, and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our Terms of Use or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is collected.

How We Share the Information We Collect

Vendors and Service Providers. We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.

Investment Sponsors. If you indicate an interest in making an investment through the Services, such as indicating an interest to buy equity or make a loan in a particular private real estate company, we will notify the party or parties offering the investment and their affiliates (the "Issuer") of your interest and may notify other Users with whom you have chosen to share information. Note that, upon your admission to an investment offering (a "Company"), the Issuer may share information including, but not limited to, member names, initial capital contributions, and distribution amounts with other members of the Company. Please refer to the terms of the Company's operating agreement and relevant state law for additional detail.

Marketing. We do not rent, sell, or share information about you with non-affiliated companies for their direct marketing purposes, unless we have your permission.

Analytics Partners. We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn more about Google's practices by visiting Google Privacy & Terms. To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, your browsing history, the searches you conduct, people you follow, investments you make, your comments, any content you post, clickstream data, advertising interactions, and the dates and times of your visits.

Advertising Partners. We work with third-party advertising partners to show you ads that we think may interest you. Some of our advertising partners are members of the Network Advertising Initiative or the Digital Advertising Alliance. If you do not wish to receive personalized ads, please visit their opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt-out of personalized ads in mobile apps.

As Required by Law and Similar Disclosures. We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. For the avoidance of doubt, the disclosure of your information may



occur if you post any objectionable content on or through the Services; (d) otherwise comply with law or regulation.

Merger, Sale, or Other Asset Transfers.

We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time the applicable information was collected.

Consent. We may also disclose your information with your permission.

Your Choices

Sharing Preferences. We provide you with settings to allow you to set your profile and other sharing preferences on the Services. Certain information may always be publicly available to others, and other information is made publicly available to others by default. To change whether certain information is publicly viewable, you can adjust the settings in your account by going to “My Account” and then selecting “Privacy and Sharing.”

Marketing Communications. You can unsubscribe from our promotional emails via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.

Do Not Track. There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.

Third Parties

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

Security

We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. We also rely on the privacy and security practices of our third-party vendors and suppliers and require them to have reasonable policies and procedures designed to protect information they process or which they have access to. However, as no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your information.



Children's Privacy/COPPA

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our Service(s) is directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at support@FinanzButik.com.

California Residents

This Privacy Notice is provided pursuant to the California Consumer Privacy Act of 2018 (CCPA) and applies solely to residents of the State of California ("consumers" or "you"). This notice outlines your rights under the CCPA and explains how [Company Name] collects, uses, and shares your personal information.

1. Personal Information We Collect

We may collect the following categories of personal information from California residents:

- **Identifiers** such as your name, email address, IP address, and phone number.
- **Commercial Information** including records of products or services purchased.
- **Internet Activity** such as browsing history and interactions with our website.
- **Geolocation Data** when accessing our website.
- **Employment Information** if you apply for a job with us.

2. How We Use Your Personal Information

We may use the personal information we collect for the following business purposes:

- To provide services or products you request.
- To improve our website and services.
- For marketing and promotional activities.
- To comply with legal obligations.

3. Your Rights Under the CCPA

As a California resident, you have the following rights under the CCPA:

- **Right to Know:** You have the right to request the specific pieces of personal information we have collected about you over the past 12 months.
- **Right to Delete:** You may request that we delete personal information we have collected about you, subject to certain exceptions.
- **Right to Opt-Out of Sale:** You have the right to opt-out of the sale of your personal information. **[Insert link to opt-out if applicable]**
- **Right to Non-Discrimination:** We will not discriminate against you for exercising your rights under the CCPA.

4. How to Exercise Your Rights

To exercise your rights under the CCPA, please contact us:

- **Email:** support@finanzbutik.com

Please note that we may need to verify your identity before processing your request.

5. Changes to This Notice

We may update this Privacy Notice from time to time. Any changes will be posted on this page with an updated effective date.

International Visitors

FinanzButik recognizes the importance of privacy and data protection laws across the Americas. In Canada, personal information is protected under the Personal Information Protection and Electronic Documents Act (PIPEDA) [PIPEDA](#). In Mexico, the Federal Law on Protection of Personal Data Held by Private Parties (Ley Federal de Protección de Datos Personales en Posesión de los Particulares) [Mexico Data Protection Law](#) governs data protection.

In Central America:

- **Costa Rica:** Law on the Protection of Individuals regarding the Processing of Personal Data (Ley de Protección de la Persona Frente al Tratamiento de sus Datos Personales) [Costa Rica Data Protection Law](#).
- **El Salvador:** Law on the Protection of Personal Data (Ley de Protección de Datos Personales) [El Salvador Data Protection Law](#).
- **Guatemala:** Law on the Protection of Personal Data (Ley de Protección de Datos Personales) [Guatemala Data Protection Law](#).
- **Honduras:** Law on the Protection of Personal Data (Ley de Protección de Datos Personales) [Honduras Data Protection Law](#).
- **Nicaragua:** Law on the Protection of Personal Data (Ley de Protección de Datos Personales) [Nicaragua Data Protection Law](#).
- **Panama:** Personal Data Protection Law (Ley de Protección de Datos Personales) [Panama Data Protection Law](#).

In South America:

- **Argentina:** Personal Data Protection Law (Ley de Protección de los Datos Personales) [Argentina Data Protection Law](#).
- **Brazil:** General Data Protection Law (Lei Geral de Proteção de Dados Pessoais - LGPD) [Brazil LGPD](#).
- **Chile:** Personal Data Protection Law (Ley de Protección de la Vida Privada) [Chile Data Protection Law](#).
- **Colombia:** General Law on the Protection of Personal Data (Ley General de Protección de Datos Personales) [Colombia Data Protection Law](#).
- **Ecuador:** Organic Law on the Protection of Personal Data (Ley Orgánica de Protección de Datos Personales) [Ecuador Data Protection Law](#).



- **Paraguay:** Personal Data Protection Law (Ley de Protección de Datos Personales) [Paraguay Data Protection Law](#).
- **Peru:** Personal Data Protection Law (Ley de Protección de Datos Personales) [Peru Data Protection Law](#).
- **Uruguay:** Personal Data Protection Law (Ley de Protección de Datos Personales) [Uruguay Data Protection Law](#).
- **Venezuela:** Law on Data Messages and Electronic Signatures (Ley Sobre Mensajes de Datos y Firmas Electrónicas) [Venezuela Data Protection Law](#).

Compliance with these statutes and regulations is essential for ensuring the privacy and security of personal information collected from users in these regions.

Update Your Information. You can update your account and profile information or close your account through your profile settings.

Changes to this Privacy Policy. We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through the Services, we will notify you through the Services, by email, or other communication.

Contact Information. If you have any questions, comments, or concerns about our processing activities, please email us at support@finanzbutik.com

Certification Regarding Foreign Ownership. In accordance with Fla. Stat. § 692.203, which governs the sale, transfer, and disposition of certain investment property, all investors hereby certify that they will fully adhere to the provisions set forth in this statute. By investing in FinanzButik, you acknowledge and understand the requirements and obligations imposed by Fla. Stat. § 692.203 and that you will comply with all provisions of Fla. Stat. § 692.203, including but not limited to the lawful sale, transfer, and disposition of investment property and will provide any necessary documentation or information as required by FinanzButik to ensure compliance with Fla. Stat. § 692.203.

Statement Regarding Suitability of Investments. Any views, strategies or products discussed on this website may not be appropriate or suitable for all individuals. Nothing on this website shall be regarded as an offer, solicitation, recommendation or advice (whether financial, accounting, legal, tax or other) given by Finanz Butik and/or its officers or employees, irrespective of whether or not such communication was given at your request. Except as expressly noted, Finanz Butik and its affiliates and employees do not provide tax, legal or accounting advice. Prior to making any investment or financial decisions, an investor should seek individualized advice from personal financial, legal, tax and other professional advisors that take into account the investor's particular circumstances and objectives.

Investments are subject to risks, including but not limited to market volatility and risks associated with the underlying investments. You could lose money, including the principal you have invested. Investing in investment funds that acquire real estate assets, including real estate investment trusts (REITs), involve unique risks similar to those associated with direct ownership of real estate, such as changes in real estate values, property taxes, zoning and land use law and regulations, interest rates, cash flow of underlying real estate assets, supply and demand, and the management skill and creditworthiness of the issuer.