Website Privacy Policy

Last modified: October 4, 2024

Introduction

Portman Holdings ("**Company**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website portmanholdings.com (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or through the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 18

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Website. We do not knowingly collect identifiable information from children under 18. If you are under 18, do not use or provide any information on this Website or on or through any of its features. If we learn we have collected or received identifiable 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 18, please contact us at:

303 Peachtree Center Avenue, Suite 575

Atlanta, GA 30303

info@portmanholdings.com

404-614-5252

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, email address, telephone number, or any other identifier by which you may be contacted online or offline ("identifiable information");
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, and information collected through cookies.

Information You Provide to Us.

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

Information We Collect Through Automatic Data Collection Technologies.

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include identifiable information. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

• **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. For information about managing your privacy and security settings for cookies, see Choices About How We Use and Disclose Your Information.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any identifiable information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though it.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose identifiable information that we collect or you provide as described in this privacy policy:

- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your identifiable information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our <u>terms of use</u> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Portman Holdings, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the identifiable information you provide to us. We have created mechanisms to provide you with the following control over your information:

• **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's <u>website</u>.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their identifiable information.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of ourWebsite who are California residents to request certain information regarding our disclosure of identifiable information to third parties for their direct marketing purposes. To make such a request, please contact us at:

303 Peachtree Center Avenue, Suite 575 Atlanta, GA 30303 info@portmanholdings.com 404-614-5252

Nevada provides its residents with a limited right to opt-out of certain identifiable information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address: info@portmanholdings.com.However, please know we do not currently sell data triggering that statute's opt-out requirements.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

303 Peachtree Center Avenue, Suite 575 Atlanta, GA 30303 info@portmanholdings.com 404-614-5252