

CATALYST Privacy Policy

Last Updated: November 1, 2016

This website is owned and operated by Buckeye Shaker Square Development Corporation. (“Buckeye Shaker Square Development Corporation”). We want you to understand what information we collect, how we safeguard that information and how we use your information. This Privacy Policy applies to the information we collect through the Buckeye Shaker Square Development Corporation websites and otherwise. Your use of the Buckeye Shaker Square Development Corporation websites and our services is subject to this Privacy Policy and the Terms of Use.

This website, and all other Buckeye Shaker Square Development Corporation websites (collectively, the “Websites”) are general audience sites and we do not knowingly collect personal, or other, information from children under the age of 18. If you are under the age of 18, please do not use our site.

We respect and value the privacy of our clients and have developed this Privacy Policy to demonstrate our commitment to protecting your privacy. This policy describes and sets forth our policies on the following topics:

1. What information we collect
2. How we collect your information
3. How we use your information
4. Disclosure of your information to third-parties
5. Updating and Accessing your information
6. Security
7. Choice/Opt-out
8. Information obtained from third-parties
9. Special Notice to California Residents
10. Special Notice to Vermont Residents
11. Notification of Privacy Policy changes
12. Contact information

This privacy statement describes how Buckeye Shaker Square Development Corporation collects and uses the personal information you provide on our website. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

You agree to this Privacy Policy by accepting Buckeye Shaker Square Development Corporation's Terms of Use, by accessing, browsing, or using this website. You can find a copy of our Terms of Use here.

1. What information we collect

We collect the following personal information:

- Contact information such as name, mailing address, e-mail and telephone.
- Personally identifiable information such as your Social Security Number and date of birth.
- Unique identifiers such as user name, account number and password.
- Preferences information such as demographic data and data about your online activity on the Websites.

We collect the following information regarding your business:

- Name, address, telephone, size, type, and various other aspects regarding your business.
- Business Documents: Some clients provide various business and personal documents to Buckeye Shaker Square Development Corporation to provide to certain potential lenders. These documents may include personal and business tax returns in addition to other sensitive documents. Any such documents are securely stored and safeguarded. At your request and with your permission, these documents may be shared with certain lenders. Under no circumstances will we disclose, transmit, or share in any way, these documents without your permission.

2. How we collect your information

- *Log Files:* Any time you visit any of our websites, our servers automatically gather information from your browser (such as your IP addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks) to analyze trends, administer the site, prevent fraud, track visitor movement in the aggregate, and gather broad demographic information. For example, we may log your IP address for system administration purposes. IP addresses are logged to track a user's session. This gives us an idea of which parts of our site users are visiting. We do not share the log files externally.
- *Cookies:* We use "cookies" to keep track of some types of information while you are visiting our website or using our services. Cookies are very small files placed on your computer, and they allow us to count the number of visitors to our website and distinguish repeat visitors from new visitors. They also allow us to save user preferences and track user trends. We rely on cookies for the proper operation of our website; therefore if your browser is set to reject all cookies, the website will not function properly. Users who refuse cookies assume all responsibility for any

resulting loss of functionality. We do not link the cookies to any personally identifiable information.

- *Web Beacons:* "Web beacons" (also known as "clear gifs" and "pixel tags") are small transparent graphic images that are often used in conjunction with cookies in order to further personalize our website for our users and to collect a limited set of information about our visitors. We may also use web beacons in email communications in order to understand the behavior of our customers. We do not link the web beacons to any personally identifiable information.
- *Sign-Up Information:* To process sign-ups, we may require your name, address, phone number, email address and other personal information. Such information is used primarily to process your order or as otherwise described herein. This is information you provide to us.
- *E-mails and Telephone Calls:* We require an e-mail address from you when you register for our services. We use your e-mail for both transactional (e.g., order confirmation, refund and renewal processing) and promotional (e.g., newsletters, new product offerings, special discounts, event notifications, special third-party offers) purposes. E-mail messages we send you may contain code that enables our database to track your usage of the e-mails, including whether the e-mail was opened and what links (if any) were clicked. If you would rather not receive promotional e-mails from us, please see the section below labeled "Choice/Opt-Out". We reserve the right to send you certain communications relating to the Buckeye Shaker Square Development Corporation services, such as service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. We may also contact you by telephone or text message (including to any wireless number you may provide to us) solely in connection with Buckeye Shaker Square Development Corporation's services. If you would rather not receive telephone calls or text messages from us, you may change or delete your number from your account preferences page(s), or ask to be removed from our contact list if you receive a call or text message from us. We fully comply with the requirements of the U.S. CAN-SPAM Act.
- *Other Sources.* We may obtain information about you from third parties such as credit reports. We do not pull a credit report without your permission.

3. How we use your information

- In general, we use your information to:
 - Deliver the products and services you have requested and which we provide;
 - Manage the customer relationship with you;
 - Research and analyze your use of, or interest in, our products and services and those offered by third parties;
 - Communicate with you about products and services;
 - Deliver tailored and targeted advertisements;

- Understand the overall effectiveness of our online advertising, content, programming and other activities; and
- Manage our business.
- Business and financial information you provide is used to attempt to match you to an appropriate business loan lender and other business products and service providers

4. Disclosure of your information to third parties

- *Disclosure By Law:* You acknowledge and agree that we may disclose information you provide if required to do so by law, at the request of a third party, or if we, in our sole discretion, believe that disclosure is reasonable to (1) comply with the law, requests or orders from law enforcement, or any legal process (whether or not such disclosure is required by applicable law) and (2) protect or defend Buckeye Shaker Square Development Corporation's, or a third party's, rights or property.
- *Lenders and/or brokers.* By signing up for our services or submitting a request for funding or a business loan product or service as offered on the Websites, you signify your agreement to proceed and that you are consenting, acknowledging and agreeing to the disclosure of you information with lenders and/or brokers within our network. We will not perform a credit check without your authorization. Please be aware that the lenders, brokers, and/or other service providers with whom you are matched and with whom your information is shared may retain your information, even if you do not enter into an agreement for their products or services. Please contact each such party directly regarding their privacy and information policies. Also, if you enter into an agreement with a lender, broker, or other service provider through the Buckeye Shaker Square Development Corporation service and make changes to the information you have provided to us, we may share the updated information with such lenders, brokers, and/or service providers.
- *Disclosure to Trusted Third Parties By Us:* Upon completing a profile on the site, we will share your information with third party service providers with whom you are matched. By accepting the Terms of Use, you agree to receive various marketing materials from our trusted third parties, including potential lenders and service providers. We are not responsible for the material of the third parties or their actions. Your information may also be shared with third-party contractors that provide services to Buckeye Shaker Square Development Corporation and are bound by this privacy policy. Your information will be treated as private and confidential by such third parties and not used for any other purpose than we authorize. In addition, from time to time, we may share personal information (such as e-mail or mailing address) about our user base with carefully selected third parties, so they can offer goods and services that we believe may be of interest to our users. If you do not wish to receive offers from our trusted partners, you can

change your e-mail preferences at any time by following the steps outlined in the “Choice/Opt-Out” section below.

By disclosing your information to us through signing up on any of the Websites and agreeing to the Terms, you expressly consent to any transfer of your information as described in this Privacy Policy, the Terms, and the Site.

5. Updating and accessing your information

You may update or access your profile information at any time by logging into your account and making any change or update. Any changes made will be updated immediately.

If you want to stop using your account you may deactivate it or delete it. When you deactivate an account, your information will not be sent to any further lenders, brokers, or other third parties, but the information will not be deleted. By deactivating your account you will have the ability to restore the account in its entirety.

You may delete your account from Buckeye Shaker Square Development Corporation. If you choose to delete your account it will be permanently deleted from Buckeye Shaker Square Development Corporation. You should only delete your account if you are certain you never want to reactivate it again.

Upon deletion of your account, data you provide to Buckeye Shaker Square Development Corporation will be retained by Buckeye Shaker Square Development Corporation in a commercially reasonable manner. Once your account is deleted, Buckeye Shaker Square Development Corporation will not share your information, and will only use your data for internal research and Buckeye Shaker Square Development Corporation marketing. Data that is retained by Buckeye Shaker Square Development Corporation will be retained for a commercially reasonable period of time as determined by Buckeye Shaker Square Development Corporation.

6. Security

We have extensive security measures in place to protect the loss, misuse and alteration of the information stored in our database. These measures include the use of Secure Socket Layer (SSL) technology during credit card transactions and administrative access to site data, as well as other proprietary security measures which are applied to all repositories and transfers of user information. We will exercise reasonable care in providing secure transmission of information between your computer and our servers, but given that no information transmitted over the Internet can be guaranteed 100% secure, we cannot ensure or warrant the security of any information transmitted to us over the Internet and hence accept no liability for any unintentional disclosure. For further information, please see our Terms of Use.

In the event there is a data breach at Buckeye Shaker Square Development Corporation, Buckeye Shaker Square Development Corporation will notify you within 45 days. We will notify you that a breach occurred, what type of information was breached, when the breach occurred, what steps you can follow to further protect your information, what actions we are taking regarding the breach and what steps we are taking to ensure the breach does not happen again.

7. Choice/Opt-Out

You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instruction included in these emails or you can contact us at **info.bssdc@gmail.com**

You can choose not to provide us with certain information, but this will likely result in the inability to use certain features of the Websites and to obtain the services and products you are seeking. As a general matter, do not post personal information on public forums. You are solely responsible for the posting of any personal information on public forums.

If, after signing up for our services, you decide you no longer wish to receive our services or future contact from lenders, brokers, or other third parties to which your information has been referred, you may cancel your account as discussed herein. Upon cancelling your account, your information will no longer be sent to lenders, brokers, or other third parties. This does not guarantee that these lenders, brokers, or other third parties will cease contacting you or using your information. Please be sure to reach out to all lenders, brokers, and/or other third parties to ensure they cease contacting you.

Certain federal and state regulations require that we maintain a record of your information for certain periods of time. Due to these regulations, we may be unable to completely delete your information from our database until the time requirements of these regulations have expired.

8. Information Obtained from Third Parties

We purchase marketing data about our customers from third parties and combine it with information we already have about you, to create more tailored advertising and products.

If you provide information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

Any information obtained from a third-party will be used to assist matching your business with various lenders.

The Websites contain links to other websites that are maintained by third parties. These third parties are solely responsible for their own websites and we encourage you to reach out to such third parties for copies of and information regarding their security practices. We do not control, and are not responsible for, the privacy and security practices of these third parties.

9. Special Notice to California Residents. If you are a resident of California, in addition to the rights set forth in this Privacy Policy:

- We will not share any personal information about you with third parties to the extent prohibited by applicable California law or to the extent your prior consent to share is required by applicable California law; and
- You have the right to request information from us regarding the manner in which we share certain categories of information with third parties for their direct marketing purposes. California law gives you the right to send us a request at a designated address to receive the following information:
 - the categories of information we disclosed to third parties for their direct marketing purposes during the preceding calendar year;
 - the names and addresses of the third parties that received that information; and
 - if the nature of the third party's business cannot be determined from their name, examples of products or services marketed.

We may provide this information in a standardized format that is not specific to your situation. Requests may be sent to **info.bssdc@gmail.com**

10. Special notice to Vermont residents.

Vermont law places additional limits on sharing information about Vermont residents so long as they remain residents of Vermont. In accordance with Vermont law, we will not share information we collect about Vermont residents to companies outside of Buckeye Shaker Square Development Corporation except: (1) As permitted by law; (2) To companies that perform marketing or other services on our behalf;

(3) Name, contact and transaction and experience information to other financial institutions with which we have joint marketing agreements; or (4) With the authorization or consent of the Vermont resident. We also will not share non-transactional information about Vermont residents received from others within the Buckeye Shaker Square Development Corporation family of companies except with the authorization or consent of the Vermont resident.

11. Notification of Privacy Policy Changes

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on this Site. We encourage you to

periodically review this page for the latest information on our privacy policy. When we make changes to this Privacy Policy we will revise the revision date at the top of the Privacy Policy.

12. Contact Information

You can contact us about this privacy policy by writing or email us at the address below:

Buckeye Shaker Square Development Corporation.

11802 Buckeye Road Cleveland, OH 44120

Email: info.bssdc@gmail.com

Phone: BUCKEYE SHAKER SQUARE DEVELOPMENT CORPORATION
(216-491-8450)