

PRIVACY POLICY

Latest Update: October 16, 2020

Safehold, Inc. (“Safehold”, “we”, “our” or “us”) is committed to protecting the data that we collect. This privacy policy (“Policy”) identifies and describes the ways in which we collect, store, use and protect the personal information received from our customers, users and website visitors (“Personal Data”). Please carefully review this Policy, the Terms of Use, and any documents incorporated herein by reference. If you do not agree with any of the terms of this Policy or the Terms of Use, please do not access or use any of the software or services covered hereunder

1. INTRODUCTION

This Policy applies to Safehold’s software platform, titled Better, and the services made available through it. This includes any mobile applications and webpages which may be found or accessed at www.heybetter.co (collectively, “Better”). This Policy also applies to any other online interactions that you may have with us including live chat, customer support inquiries, presentations, events, etc. Better is intended only for users in the United States, and its use is governed exclusively by US law.

2. COLLECTION AND USE

As used herein, “Personal Data” refers to information that can be used or combined with other information to identify you, contact you, or locate you, which includes information such as your name, company name, email address, billing address, payment information, or any other personal information that you provide to us. We collect Personal Data that you voluntarily submit directly to us when you access or use Better. This includes information that you provide to us when you register for a user account, complete a digital form, correspond with us, subscribe to our mailing lists, newsletters or other forms of marketing communications, respond to surveys, publish materials, or use other available features of Better. We may also gather information about the location, device, and operating system used to access or use Better in order to guide future development of our services. We may anonymize and aggregate any of the Personal Data that we collect (so that it does not directly identify you or them),

including information about our website visitors or customers. The sections below set forth specific details for each of the groups from which data is collected, namely, (1) websites visitors and (2) registered users of Better.

a. *Websites Visitors*

If you merely visit, view, or access any of the webpages located www.heybetter.co or any of our websites but you are not a registered user of Better, this section applies to you ("Visitor"). By visiting any of our websites, you consent to the collection and use of your Personal Data in accordance with this Policy including any disclosures published within our websites. If you do not agree with any of these data collection practices, please do not visit our websites. If required by applicable law, we will seek your explicit consent to process Personal Data collected through our websites. Any consent will be entirely voluntary. However, if you do not grant the requested consent, use of our websites may not be possible in certain instances.

i. Data collected from Visitors. We may collect and record certain information from Visitors. Collected Personal Data may include your first name, last name, and email address. We may also record IP addresses, use cookies, and record information collected by way of page-view activity. Furthermore, we may collect and process any Personal Data that you volunteer to us in forms found on the websites, such as, for example, when you request a demo or thought leadership or marketing content such as white papers, case studies, articles, and other materials. We also gather certain data that relates to Visitors' access to our websites, including numbers of Visitors and visits, geo-location data, length of time spent browsing a webpage, pages accessed, or sources from where Visitors come.

ii. The purpose of our processing Personal Data collected from Visitors. We use the collected Personal Data to communicate with Visitors, to provide information requested by Visitors, to show ads, to market our services, to improve our websites by analyzing how Visitors navigate it, or other uses with your consent. We also use Personal Data collected or submitted through our websites to remember Visitors in order to prevent the need to complete multiple forms over and over again, identify potential new

clients who have interacted with us on our websites, or contact Visitors via email with marketing and informational materials.

iii. How long is the data collected from Visitors stored? Personal Data collected from Visitors will be stored for up to two years or until we receive a data deletion request. If a Visitor becomes a registered user of Better, Personal Data will be stored for as long as needed to perform Better's services. You can request data deletion by contacting us at privacy@heybetter.co.

iv. How can I manage my personal information? If you wish to update, remove, or add to the information collected by our websites, you may submit your request to us at privacy@heybetter.co.

b. Registered Users of Better

If you become a registered user of Better ("Registered User"), this section applies to you. By becoming a Registered User of Better, you consent to the collection and use of your Personal Data in the manner described in this Policy. If you do not agree with any of these terms, please do not access or use Better. When required by law, we will seek your explicit consent to process Personal Data. Any consent will be entirely voluntary. However, if you do not grant the requested consent, your use of Better may not be possible.

i. Data collected from Registered Users. When you open an account or create a new user profile with Better, you will need to submit certain Personal Data to us which will be associated with your account. This includes your first name, last name, address, email address, telephone number, zip code, job title or description, tax ID or social security number, income, marital status, children, bank account and routing numbers, bank account balances, Facebook usernames, Google usernames, desired tax withholdings, and other information that you provide in order to enable Better to carry out its services. Certain additional information may be collected automatically, including information about how frequently you access Better, the times you access Better, how long you use it, and the actions you take within the platform. We do not collect or store any credit card-related

information for payment purposes. All payments are processed via reputable third-party payment processors.

ii. The purpose of collecting Personal Data from Registered Users. We use Personal Data collected from Registered Users in order to provide and administer Better's services. This includes using Personal Data in order to verify user identity, analyze the use of Better, collect and report use metrics, troubleshoot and debug Better, notify you about changes to Better relevant to your user account or user profile, market to you other services offered by us, provide customer support, and other uses with your consent. We may periodically publish customer and user testimonials on our websites or applications which may contain Personal Data such as the Registered User's name. We obtain consent prior to posting testimonials. If you want to remove Personal Data displayed in any public pages please send your request to privacy@heybetter.co. The content of any comments or messages, along with identifying information, sent by a Registered User through Better will be disclosed to us and to other users to whom a message may be directed, or if in a public comment section, to users that have access to that comment section.

iii. How long will my information be held? Personal Data collected from Registered Users will be stored for long as needed to provide Better's services and at least for as long you remain a Registered User. Once a Registered User's account is permanently deleted and the services are no longer being provided, we will delete or anonymize information associated with that former Registered User within one year from the account's lapse date.

iv. How can I manage my personal information? You may make certain changes to your Personal Data by visiting Better's account settings page. Alternatively, you may send a request to privacy@heybetter.co with the information that you wish to update, add, or remove. We will require verification of your identity before making any changes to your user account.

v. What happens if my Registered User account is closed? If your Registered User account is closed due to a violation of the Terms of Service, or at your request, you may contact us to request the deletion and anonymization of your Personal Data. Each request of this type will be

examined on a case-by-case basis and we will act in accordance with applicable legal requirements. Unless contacted sooner, we will delete personal information for closed accounts within one year from the date that the account was permanently closed.

vi. What happens to my data after using a trial account? Upon the completion of a trial, if your account is not converted to a Registered User account, your account and its associated data will be anonymized and will no longer be available within one year from the end of your trial period.

3. SHARING PERSONAL DATA

We may share Personal Data with third-party service vendors or contractors, including Google, Zendesk, Twilio Plaid, and Intuit, in order to provide Better's services, in connection with a specific service or transaction that you may request by you, or in order to analyze behavior on our websites or applications. We may also share Personal Data for the following purposes:

- Storing your data using third-party digital storage solutions
- Managing our communications with you using third-party communications solutions
- Sending you advertisements for our or our partners' products or services
- Processing claims relating to intellectual property
- Verifying user identity
- Providing information to government agencies
- Filing documents on users' behalf
- Connecting with a third-party bank
- Processing payment
- Conducting research, surveys, or analytics
- Other uses with your consent

We encourage you to review the privacy policies of all third-party vendors before using them or Better. In the event that Safehold is acquired or transfers some or all of its operations or assets to another company, information collected, including Personal Data, may be one of the assets so assigned. You hereby consent to such a transfer of your Personal Data, provided that the transferee shall be bound by the terms of the Policy in effect at the time of its collection.

We will disclose Personal Data without prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact, or to initiate legal proceedings against persons who are suspected of infringing rights or property belonging to us or to others. We are permitted to disclose Personal Data when we have good reason to believe that it is legally required.

4. STORING PERSONAL INFORMATION

We use Amazon's AWS S3 servers located in the United States in order to store Personal Data that we collect. Please review Amazon's privacy policy here: <https://aws.amazon.com/privacy>. By using Better you acknowledge that your Personal Data will be transmitted to, stored, and accessed in the United States and in accordance with Amazon's privacy policy. Our websites use third-party analysis and tracking tools whose servers may be located in any country in which these third parties have their facilities. The Personal Data that we collect may be transferred to and stored in countries outside of the jurisdiction in which you are located where we and our third-party service providers operate. If you are located in the European Union ("EU"), your personal information will be processed outside of the EU including in the United States. These international transfers of your Personal Data are necessary for the performance of Better's services.

5. SYNCING, LINKING, CONNECTING YOUR BANK ACCOUNT YOUR BETTER USER ACCOUNT

You may choose to sync Better with information from other financial accounts. To sync your financial account information, we must access your online account with your financial institution. We will request your user name, password, and any other login bank data that you have set up with your financial institution to enable access. We use this information to update and maintain the account information you download, to assist with the download process, and to enhance the services we may provide in the future.

6. COOKIES

Better and our websites and applications use “cookies”. Cookies are small pieces of information sent by a website or application to the hard disk of a user’s device. By continuing to visit our websites or Better, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as good as it would otherwise be. We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits the user.

7. LINKS TO OTHER SITES

While visiting our websites or using Better visitors or users can follow links to other sites or services that are beyond our sphere of influence. Please take care to review these sites or services, and their privacy policies. We are not responsible for the content or privacy policies of these other sites or services.

8. HOW IS MY INFORMATION PROTECTED?

We take appropriate technical and organizational security measures against loss or unlawful processing of Personal Data. To this purpose, your Personal Data is securely stored within our database, and we use standard, industry-wide, commercially reasonable security practices such as encryption using 256-bit SSL-encrypted connections and firewalls, as well as physical safeguards of the locations where data are stored. We cannot, however, ensure or warrant the security of any information you transmit to us or store on Better and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

The AWS S3 servers that store Registered User and Visitor data are secured using industry-leading security technology. For additional information about the security measures used for these servers, please visit <https://aws.amazon.com/security>. Please take all steps necessary to maintain the security of your Registered User account access credentials. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from Better, at all times.

9. EUROPEAN DATA PROTECTION AND OWNERSHIP

Individuals located in the European Union have a legislated right to change, request deletion of, or know the extent of personal information collected by organizations. Unless required to do otherwise by law, we will honor requests to update, correct, change, or delete personal data following successful identity verification. For Registered Users and Visitors from the European Union, all processing and transferring of Personal Data is performed in accordance with privacy rights and regulations following the General Data Protection Regulation (GDPR). We have adopted reasonable physical, technical and organizational safeguards which substantially mirror the EU safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the personal data in our possession. We will promptly notify Registered Users in the event of any known unauthorized access to, or use of personal data.

10. SOCIAL MEDIA FEATURES

Better may use certain social media features. These features may collect your IP address and which page you are visiting within our services, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our services. Your interactions with these features are governed by the privacy statement of the company providing the relevant social media features.

11. DATA PROTECTION OFFICER

We have an appointed “Data Protection Officer” who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached using the following contact details:

Safehold, Inc.
Attn: Data Protection Officer
1530 The Alameda, Suite 305
San Jose, CA 95126
Email: privacy@heybetter.co

12. COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION

Better is for and directed to adults. We do not knowingly collect Personal Data from minors.

13. CALIFORNIA PRIVACY RIGHTS

We do not share your Personal Data with third parties for their marketing purposes without your consent.

14. CHANGES TO THIS POLICY

We may amend this policy at any time by posting a revised version at any links providing access to this policy. Please check back occasionally for updates. Please feel free to contact us regarding our privacy policy via email at privacy@heybetter.co or write to us at:

Safehold, Inc.
1530 The Alameda, Suite 305
San Jose, CA 95126

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