

PRIVACY POLICY

Effective Date: May 15, 2025

This Privacy Policy describes how EMP Capital Group and its affiliates, subsidiaries, and related entities (collectively, “EMP,” “we,” “our” or “us”), processes Personal Information through our website at **ProsperBrooklyn.com** (the “Site”). Unless specifically stated otherwise, this Privacy Policy applies to Personal Information that we gather or collect via the Site and any other EMP website or online service that posts a link to this Privacy Policy.

For purposes of this Privacy Policy, “Personal Information” means information that identifies, relates to, or could reasonably be linked with an individual. Personal Information does not include publicly available, deidentified, or aggregated information.

We may update this Privacy Policy from time to time, as indicated by the “Effective Date” date at the top of this Privacy Policy. Any changes to this Privacy Policy will be effective as of the “Effective Date” date at the top of this page, unless otherwise expressly indicated. We encourage you to review this Privacy Policy and all points below whenever you visit the Site.

Collection of Personal Information

We and/or our vendors may obtain Personal Information about you in several ways, including directly from you; automatically through the Site; and from our service providers, partners, and other parties.

We may obtain the following categories of Personal Information about you. The Personal Information we and our vendors obtain about you may vary depending on how you interact with us. For example, we may collect your:

- Name and contact information (including email address, phone number, and physical address) when you contact us via our webform.
- Account information and payment and billing information when you register for an account with us and make payments on your account.
- Demographic information, such as your age, gender, zip code, and interests when you fill out surveys on our Site.

We may combine this Personal Information we collect through the Site with other information we obtain about you.

Cookies and Other Similar Technologies

We and our vendors may use cookies, web beacons, pixels, and other similar technologies (collectively, “Cookies”) to collect and store information about your interactions with our Site, including browsing behavior, such as the pages you visit, the time and duration of your stay, and your referring URL; internet and browser identifiers, such as browser type and domain name; and device details, such as operating system, IP address, and device ID.

We may use third-party technologies (such as Google Analytics and the Meta Pixel) in connection with your activity on the Site, including for advertising purposes and to analyze your interactions and experiences, including the features you engage with, how you navigate, and your click/touch, movement, scroll, and keystroke activity. These technology companies and advertisers may use, store, or access cookies and other tracking technologies to collect or receive information from across the internet.

You may be able to opt out of certain interest-based advertising using the settings on your browser or mobile device. In addition, the following services or organizations offer tools that you can use to limit or opt out of interest-based advertising:

- **Facebook/Meta.** To change your privacy and advertising settings with Facebook, log in to your Facebook account and navigate to your account settings.
- **Google.** We use Google Analytics to help us understand and analyze how visitors use the Site. We use this information to implement Google advertising features such as interest-based advertising, audience targeting, and impression reporting. For more information on how Google Analytics uses the data it collects, click [here](#). To opt out of Google Analytics, click [here](#). To adjust your Google advertising settings, click [here](#).
- **DAA/NAI.** To opt out of interest-based advertising from companies that participate in the Digital Advertising Alliance (“DAA”) or Network Advertising Initiative (“NAI”) opt-out programs, please visit [the DAA](#) and the [NAI](#).

You may be able to opt out of certain interest-based advertising using the settings on your browser. Your choice(s) may apply only to the browser or device you are using when you opt out, and you will still receive ads, but they may not be as relevant to you and your interests. Please note that we do not control how third parties manage their opt-out processes, and if you disable cookies some features on our Site might not function properly.

Use of Personal Information

We retain and use Personal Information in connection with the operation of our business, including to:

- **Provide Services or Process Transactions**, including by maintaining or servicing your account; operating and maintaining our Site; providing information about our Site and services; processing your payments and other transactions; communicating with you about our Site and services; and responding to your requests and questions.
- **Communicate with You**, including providing account notifications or service order updates; responding to your questions or feedback; confirming your preferences; providing you information about our Site and services; and contacting you regarding services, billing, and transactions; updating you about features and offers that we believe will be of interest to you; informing you about sweepstakes, contests, or promotions in which you have participated; and responding to your questions or other requests; and conducting user surveys.
- **Operate Our Business**, including performing system administration and technology management; carrying out internal administration, such as recordkeeping and auditing; identifying prospective tenants, partners, service providers, and vendors; managing our relationships with our tenants, partners, service providers, and vendors; and fulfilling other purposes disclosed at the time you provide your Personal Information.
- **Conduct Business Analytics**, including evaluating how our Site performs; tracking and responding to quality and security issues; forecasting and planning; developing statistics on engagement with our Site; and measuring how well marketing and promotional activities perform.
- **Maintain Security and Integrity**, including protecting our Site from cyber risks; authenticating users; preventing, identifying, investigating, and responding to fraud, illegal or malicious activities, and other liabilities; enforcing our policies and terms; protecting our rights; fulfilling our legal obligations; and generally providing you with a secure experience when using our Site.
- **Perform Quality, Safety, and Internal Research**, including evaluating how our Site performs; repairing or improving the quality of our Site; tracking and responding to quality and security issues; and developing new or enhanced products and service offerings.

- **For Advertising and Marketing**, including measuring the use of our Site and effectiveness of our advertising and marketing; and uncovering insights to improve our Site and provide our users with enhanced features and functionalities, such as personalized experiences.
- **For Legal and Compliance Purposes**, including complying with applicable law, court order, governmental regulations, or other legal obligations; assisting in an investigation, regulatory requests, litigation, or arbitration; protecting and defending our rights and property, or the rights or safety of third parties; enforcing our terms, policies, or any agreements with third parties; comply with health and safety obligations; and prevent crime.

Disclosure of Personal Information

We may disclose your Personal Information for the purposes described above to the following parties:

- Our group of companies, including with our affiliates, subsidiaries, locations, and brands.
- Agents, vendors, consultants, and other service providers so that they may provide their services to us, including customer service, Site operation and maintenance, product and customer service improvement, promotional support, payment processing, auditing and quality control, communication, and other business operations.
- Other parties at your direction or through your action.
- Vendors and other parties for marketing purposes, to improve our products and Site, or to provide you with products and services that may interest you.
- Advertising partners for the purposes of ad targeting, remarketing, and customized advertising content.
- Government or private parties to comply with law or legal process, respond to requests from public and government authorities, enforce our terms and conditions, protect our operations and our rights, privacy, safety or property of you or others, and allow us to pursue available remedies or limit the damages that we may sustain.
- Our insurers and professional advisors, to manage risk, exercise or defend against legal claims, and otherwise obtain professional advice.
- Third parties as part of or during negotiations of any reorganization, acquisition, merger, sale, joint venture, assignment, transfer, or other transaction where another party assumes control over all or part of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).

Data Security

We take reasonable steps to secure your Personal Information. However, no data storage or transmission can be guaranteed to be completely secure and without risk. Thus, no storage or processing of your Personal Information or other information on the Site, or on other servers or databases to which the information may be transferred, can be guaranteed to be completely secure.

Sweepstakes, Contests, and Promotions

We may use your Personal Information to send you marketing materials; conduct surveys, contests, and sweepstakes; and to award prizes. We may request additional information to participate in contests and surveys (such as your contact information, personal opinions, preferences, and interests). Participation in these promotions is completely voluntary and you may choose whether or not to participate and therefore disclose your Personal Information. Contact information will be used to notify the winner and award prizes. If you choose to enter a sweepstakes, contest, or other promotion, your Personal Information may be disclosed to third parties or the public in connection with the administration of such promotion, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law, such as on a winner's list.

Other Online Services

The Site may include functionality that allows interactions between the Site and a third-party website, platform, tool, application or other service, and accessing or display of third-party content via the Site. For example, you may be able to share content from the Site to your social media profile on an external online service. Additionally, the Site may contain external links at your convenience that we do not control, review, or have responsibility over. This Policy does not apply to the practices of companies that we do not own or control.

Contact Us

If you have any questions about this Privacy Policy, you may contact our management company by email at office@frontgateny.com.