

PANATTONI US PRIVACY POLICY & COOKIES STATEMENT

Effective October 8, 2025

Panattoni Development Company, Inc., and its affiliated entities (“Panattoni,” “we,” “us,” or “our”) respects your privacy and values your trust. The purpose of this Privacy Policy is to inform you of the treatment and handling of personal information that we may learn about you from using our websites at www.panattoni.com (“Site”), our social media channels (e.g., Instagram and LinkedIn), third-party services we use in connection with our clients, and/or through the performance of our professional services (collectively, the “Services”). “You” and “your” or similar terms refer to you as a user of the Services. If you provide personal information to us relating to other individuals, you are responsible for communicating the terms of this Privacy Policy to them. If you have any questions regarding this information or our privacy practices, please contact us via the methods set out in the How to Contact Us section at the end of this Privacy Policy.

This Privacy Policy applies to individuals in the United States. It is intended to address applicable U.S. federal and state privacy laws, including, as relevant, the California Consumer Privacy Act, as amended (“CCPA”), and the Children’s Online Privacy Protection Act (“COPPA”).

- **Agreement to Terms.** By using the Services, you consent to our Privacy Policy. If you do not agree with the terms of this Privacy Policy and our Terms of Use, then you should immediately discontinue use of the Services without providing us with any personal information.
- **Information We Collect.** Panattoni collects the following categories of information (a) directly from you if you contact us via email, for example, if you apply for a job at Panattoni or make other inquiries; (b) in the course of our provision of professional services to you or others, including documents or communications we receive from our clients, counterparties, and regulatory or law enforcement agencies; (c) from third parties performing services on our behalf (e.g., webinars, presentations) or recruiters as part of the recruitment process; (d) from the device and browser that you use to access the Services; and (e) via cookies and similar technologies.
 - o *Identifiers.* We may collect your name, email address, postal address, telephone number, and signature.
 - o *Professional or Employment-related Information.* We may collect the name of the company you work for or represent and your position. We may also collect your past employment history (e.g., company name, job title, office location) as part of our recruiting process.
 - o *Government Identifiers* (including Sensitive Personal Information where applicable under certain state laws). We may collect government identifiers as part of our business acceptance procedures or our recruiting procedures. This information may include your Social Security number and/or a copy of your passport or other government identification card.

- o *Education Information.* We may collect information such as your educational degrees, institutions attended, professional membership, qualifications, and certifications.
- o *Financial Information.* We may collect payment information, such as your bank account details or credit card information.
- o *Device Information.* We collect device information when you visit the Site(s). This includes your computer or mobile device type, browser type, unique identifiers, IP address, and general location information derived from your IP address.
- o *Internet or Electronic Network Activity Information.* We may collect information concerning your interaction with the Site(s), including when you access a Site and your browsing activity on that Site (such as which pages you visit, in what order, and for how long). This may include “traffic” data or tracking information provided by the Site’s host or similar providers (e.g., Google Analytics) that may be helpful for improving the Site(s).

You are not required to provide all personal information identified in this Privacy Policy to use our Services or to interact with us, but certain functionality will not be available if you do not provide certain personal information. For example, if you do not provide certain personal information, we may not be able to respond to your requests.

- **Cookies.** We store certain information that gets collected automatically through cookies and other similar technologies on the Sites. A cookie is a small string of information that a website that you visit transfers to your browser for identification purposes. Cookies can be used to follow your activity while using a website or across websites, and that information helps companies understand your preferences and tendencies, as well as improve and personalize your website experience. Some cookies are necessary to operate a website, while others can be functional or used for analytics. Cookies on the Sites are generally divided into the following categories
 - o *Strictly Necessary Cookies:* These are required for the operation of the Sites. They include, for example, cookies that record your cookie preferences.
 - o *Analytical/Performance Cookies:* These allow us to recognize and count the number of users on each Site and understand how such users navigate through each Site (e.g., when and which pages are visited, in what order the pages are visited, and where a user is located). This helps improve how each Site works, for example, by ensuring that users can find what they are looking for easily. We may use Google Analytics and HubSpot or similar services for part of this process. For more information about Google Analytics, please visit <http://www.google.com/policies/privacy/partners/>. You can opt out of Google Analytics’ collection and use of data generated by your use of the Site by going to <https://tools.google.com/dlpage/gaoptout>. To learn more

about HubSpot's cookies, please visit

<https://knowledge.hubspot.com/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser>.

- o *Functional Cookies*: These improve the functional performance of websites and make them easier for you to use. For example, we may embed certain videos that are hosted on third-party platforms. Those platforms may set functional cookies to remember your preferences (e.g., your preferred language), to remember user input, and to detect and resolve problems with their services.
- o You can prevent the use of certain cookies by modifying your Internet browser settings, typically under the sections "Help," "Internet Options," or "Settings." If you disable or delete certain cookies in your Internet browser settings, you may still access the Sites; however, you might not be able to access or use important functions or features of the Sites.
- o Do Not Track and Global Privacy Control Signals. At this time, Panattoni does not respond to browser "Do-Not-Track" signals. Where legally required, we will process browser-based opt-out preference signals (such as Global Privacy Control) as a request to opt out of any sale or sharing of personal information for cross-context behavioral advertising. As described below, we do not sell personal information or share it for cross-context behavioral advertising.
- **Children's Privacy**. The Sites are not directed to children under 13 years of age, and Panattoni does not knowingly collect personal information from children under the age of 13. If you are aware of, or suspect that, someone under the age of 13 is using a Site without permission, please notify us immediately by contacting us as detailed below. If we learn that we have collected personal information from a child under 13, we will take reasonable steps to delete such information as required by COPPA. For guidance on protecting children's privacy online, please see the Federal Trade Commission's resources.
- **Our Use of Personal Information**. We collect and use personal information for the following purposes:
 - o Providing the Sites to you and providing services requested by, or reasonably anticipated within the context of our relationship with, you;
 - o Managing, administering, and improving our provision of services to our clients;
 - o Managing our relationship with you, responding to inquiries or requests, and administering surveys;
 - o Promoting our services, including by sending event invitations, updates, and other marketing materials;
 - o Analyzing use of the Sites;
 - o Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, or prosecuting those responsible; and
 - o Complying with legal and regulatory obligations.

- **Our Disclosure of Personal Information.** Panattoni may share information with third parties as follows:
 - o *Service Providers.* We may use other businesses (“Service Providers”) to perform services on our behalf, such as information technology service providers, third parties to whom we outsource support services, web analytics providers, marketing providers, and payment processing services. We provide our service providers with the information reasonably necessary for them to perform the services on our behalf. Each service provider must agree (a) to implement and maintain reasonable security procedures and practices appropriate to the nature of the information involved in order to protect your information from unauthorized access, destruction, use, modification, or disclosure and (b) not to retain, use, or disclose the information for any purpose other than for the specific purpose of performing the services for us, or as otherwise permitted by law.
 - o *To Perform our Services.* We may disclose information in the course of performing professional services on behalf of our clients, including to advisors, financial institutions, other professional advisors, auditors, and risk and compliance advisors.
 - o *Legal Purposes.* We may disclose your information for legal reasons, e.g., to government bodies (including tax authorities), dispute resolution organizations, law enforcement agencies, or other third parties, (a) if we are legally required to do so (for example, in response to subpoenas, court orders, or legal process) or to establish, protect, or exercise our legal rights or defend against legal claims; (b) to protect the rights and property of Panattoni, our employees, or the public; or (c) to investigate, prevent, or take action regarding illegal activities, fraud, or situations involving potential threats to the safety of any person.
 - o *Changes to our Business.* We may disclose information with third parties in connection with a change to the control or financial status of the company, including a corporate restructuring, sale, acquisition, financing, reorganizations, bankruptcy, receivership, transfer, or assignment of assets or business merger or divestiture. Personal information may be shared in diligence and transferred to a successor or affiliate as part of that transaction.
 - o *Aggregated Information.* We may use and disclose aggregated data and information for any purpose. This aggregated data will not personally identify you.
- **Your Privacy Choices.** If you no longer want to receive our marketing communications, you may unsubscribe at any time by following the unsubscribe options in the communication itself. Please note that we may still send you non-promotional messages, such as those about our ongoing business relationship. Depending on your state of residence, you may have additional choices described below.

- **Security and Retention.** We maintain reasonable technical and organizational measures to protect personal information from loss, improper or unlawful access, misuse, alteration, or unintentional destruction consistent with applicable data protection laws. Although we seek to protect your personal information and privacy, we cannot guarantee the security of any information you disclose online. To the extent permitted under applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized access by third parties, or other causes beyond our control. We retain personal information for as long as necessary to fulfill the purposes for which the information was collected; as needed to address tax, compliance, employment, litigation, and other legal rights and obligations; and/or as otherwise permitted by law. We limit our use and retention of sensitive personal information to purposes that are reasonably necessary and proportionate to provide the Services and meet applicable legal and regulatory obligations.
- **Additional Information for California Consumers.** For individual residents of California, this section describes how we collect, use, and/or disclose the personal information of California residents, and the rights you may have under California law. These disclosures are intended to supplement this Privacy Policy with information required by California law. To understand what categories of personal information we may have collected about you in the past 12 months, and from where we collected it, please see the sections Information We Collect and Cookies above. We collect this personal information for the business purposes described in the Our Use of Personal Information section above. We may share personal information with the third parties listed above in the section Our Disclosure of Personal Information. These third parties cannot further collect, sell, or use the personal information we share with them except as necessary to perform our purposes, as instructed by us.
- In the past 12 months, we may have disclosed the following categories of personal information to the following third parties for our operational business purposes:

<i>Identifiers</i>	<ul style="list-style-type: none"> • Service providers • Law firms, advisors, and financial institutions
<i>Professional or Employment-related Information</i>	<ul style="list-style-type: none"> • Service providers • Law firms, advisors, and financial institutions
<i>Government Identifiers</i>	<ul style="list-style-type: none"> • Service providers • Law firms, advisors, and financial institutions • Government bodies (e.g., tax authorities)
<i>Education Information</i>	<ul style="list-style-type: none"> • Service providers • Law firms, advisors, and financial institutions

<i>Financial Information</i>	<ul style="list-style-type: none"> • Service providers • Law firms, advisors, and financial institutions
<i>Device Information</i>	<ul style="list-style-type: none"> • Service providers
<i>Internet or Electronic Network Activity Information</i>	<ul style="list-style-type: none"> • Service providers

- **California Residents' Rights.**

- If you reside in California, you may have the following rights under California law:
 - **Notice at Collection:** You have the right to notice, at or before the point of collection, of the categories of personal information collected, the purposes for which the information is collected, whether such information is sold or shared, the retention period or criteria, and the categories of third parties to whom we disclose personal information. We provide this notice through this Privacy Policy.
 - **Access:** You have the right to access a copy of the categories and specific pieces of personal information that we have collected, used, disclosed, sold, or shared.
 - **Correction:** You have the right to request that we correct inaccurate personal information that we hold about you.
 - **Deletion:** You have the right to request that we delete your personal information, subject to certain exceptions.
 - **Portability:** You have the right to request that we provide certain personal information to you in a portable format.
 - **Opt-Out of Sale or Sharing:** You have the right to opt out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising. We do not sell personal information and we do not share personal information for cross-context behavioral advertising.
 - **Limit Use and Disclosure of Sensitive Personal Information:** You have the right to limit our use and disclosure of sensitive personal information to certain permitted purposes. We do not use or disclose sensitive personal information for purposes other than those permitted by California law.
 - **No Retaliation:** You have the right to be free from discrimination for exercising your rights.
- If you wish to exercise the rights described above, please contact us at info@panattoni.com. We will respond to your request consistent with applicable law. Before we can process your request, we will need to verify your identity for security purposes. If you use an authorized agent to submit a request, we may require proof of your authorization and may also require you to verify your identity directly with us. Certain exceptions and

limitations apply to the rights described above, including with respect to information subject to evidentiary privileges or collected and used in certain business-to-business or employment contexts, where allowed by law.

- **Additional Information for Residents of Certain U.S. States.** Residents of some U.S. states beyond California, including, for example, Colorado, Connecticut, Utah, Virginia, Oregon, Montana, Texas, Tennessee, and others, may have rights with respect to their personal information, which may include the right to confirm processing, access, correct, delete, obtain a portable copy of certain personal information, and opt out of targeted advertising, the sale of personal information, and certain profiling. If you reside in one of these states, you may submit a request to exercise any available rights at info@panattoni.com. If we deny your request, you may have the right to appeal our decision. To appeal, please email us at info@panattoni.com with "Privacy Rights Appeal" in the subject line and provide a copy of our decision or the request reference number. We do not sell personal information and we do not engage in targeted advertising as defined under these state laws.
- **Links to Other Websites.** For your convenience, we may link to third-party sites and services, or otherwise display third-party content through our websites to provide increased value to our visitors. We have no control over these linked sites, each of which has separate privacy and data collection policies and practices independent from us. As such, we have no responsibility or liability for these independent policies or actions and are not responsible for the privacy practices or the content of any such websites. We encourage you to review their policies before engaging with these third-party sites.
- **Effective Date and Changes to this Privacy Policy.** This Privacy Policy is effective as of the date at the top of this policy. Panattoni has the discretion to update this Privacy Policy at any time. When we do, we will revise the effective date at the top of this page. We encourage users to frequently check this page for any changes and to stay informed about how we are helping to protect the personal information we collect, especially before you provide information, and particularly personal information, directly to us through the Services. In the event of a material change to this Privacy Policy, we will provide a notice through our website or via email informing you of the change.
- **How to Contact Us.** If you have any questions about this Privacy Policy or the Services, please contact us by emailing info@panattoni.com, or send written correspondence to:

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