

## **Privacy Policy**

Effective date: September 15, 2022

This Privacy Policy ("Policy") tells you how we collect, use and share information, including Personal Information we collect in our interactions with: (i) visitors to our Radius Global Infrastructure, Inc. and its subsidiaries' ("Company," "we", "us", "our") websites (each, a "Site"); (ii) our clients and potential clients; (iii) our vendors and suppliers; and (iv) any other third parties that provide us with Personal Information. By using the Site or otherwise submitting Personal Information to us, you acknowledge and understand that we may use and disclose your information according to the terms of this Policy.

"Personal Information" is any information that enables us to identify you, directly or indirectly, such as your email address, name, shipping and billing address, telephone number, company name, payment information (including credit card and bank details), any form of identification number or one or more factors specific to your physical, physiological, mental, economic, cultural or social identity.

For the purposes of the General Data Protection Regulation 2016/679, including as it applies in the UK by virtue of the European Union (Withdrawal) Act 2018, (collectively the "GDPR"), the data controller is AP Wireless Infrastructure Partners, LLC, whose registered office is at 4250 Executive Square, Suite 900, La Jolla, CA, United States.

### **Personal Information collected.**

We collect Personal Information from site owners, real property interest holders, clients, potential clients, or employees or owners of such companies. The information may include basic personal details (name, employer, job title, username, and password), payment information (billing and shipping address and card information), information about properties you own or control, contact information if you contact us with an inquiry (email address, telephone number, physical address), and/or information generated during the course of our dealings with you or your employer.

We also collect Personal Information from vendors, suppliers, and other third parties. We will collect information needed to engage with, and obtain products and services from, such third parties.

You may browse our Site anonymously or you may choose to provide information to us. We collect information that you submit when visiting the Site.

We automatically collect information when you visit the Site, including your device's IP address, and statistics about how you use the Site. This may include the pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from the page. We do not treat this information as Personal Information, except where the information can identify you when associated with other Personal Information we hold or where we are required to do so under applicable law.

When you provide data to us, we expect that it will be accurate and current. Given the nature of our business and our relationship with you, we do not anticipate routinely collecting any special categories of personal data (sometimes called sensitive data). You are not obliged to provide us with any Personal Information, but if you choose not to do so we may be unable to correspond with you or enter into an agreement with you.

Please see our Cookie Notice for information about our use of cookies and similar technologies. We do not use technology that recognizes a “do-not-track” signal from your web browser.

### **How we use your Personal Information.**

We use your Personal Information according to the terms of the relevant version of this Policy in effect at the time of our collection. We reserve the right to update this Policy at any time and we recommend that you regularly review this Policy to ensure you are aware of the latest version.

We will process your Personal Information only where we have a lawful reason to do so. Such lawful reasons may include: (1) where you have provided your consent (which can be withdrawn at any time), (2) where the processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into such a contract, (3) where we are required by law, (4) where processing is required to protect your vital interests or those of another person, or (5) where the processing is necessary for the purposes of our legitimate commercial interests, except where such interest are overridden by your fundamental rights and freedoms.

We primarily use the Personal Information that we collect for our legitimate commercial interests, such as to improve our Site, interact with clients, suppliers and other third parties, grow our business and offer our own, or our affiliates' products or services that we think you may find of interest. This may include processing your Personal Information for the following reasons:

- To respond to your requests, including providing you with support, monitoring and improving our responses and investigating and addressing your concerns;
- To provide services to you, including customer services issues;
- To send communications to you about our current services, new services that we are developing, and opportunities that may be available to you;
- To alert you to new features or enhancements to our services;
- To communicate with you about your transactions or potential transactions with us;
- If you are an existing customer, to administer your account, including processing of payments;
- To expand our business, including providing, supporting, personalizing and developing our Site, products and services and evaluating changes to our business;
- To ensure that our Site and our services function in an effective manner for you;
- To keep our Site safe and secure, including to respond to law enforcement or other regulatory requests; and
- To measure or understand the effectiveness of advertising and outreach.

Where you are a client, supplier, or other third party and you contract with us on an individual basis, we will also use your Personal Information to enter into, and administer, your contract with us.

We use your contact information to respond to your inquiries or to provide information on products or services to you (with your consent where required by law). We endeavor to collect only such Personal Information that is reasonably necessary to perform services for you or to respond to your inquiries.

We use cookies and similar technology to operate and improve our Sites. We may from time to time allow selected third parties to place cookies through the Site to provide us with better insights into the use of the Site or user demographics or to provide relevant advertising to you. These third parties may collect information about a consumer's online activities over time and across different websites when he or she uses our website. We may also permit third party service providers to place cookies through our Site to perform analytic or marketing functions where you are notified of them, and you have consented to the usage. We do not control the use of such third-party cookies, or the resulting information and we are not responsible for any actions or policies of such third parties. For more information about our use of cookies, please see our Cookie Policy.

#### Children's Privacy.

This Site is not designed nor intended to be attractive to use by children under the age of 13. We do not knowingly collect information from children under the age of 13. If you are under 13, please do not submit any information to us. If you have reason to believe that we have collected information from a child under the age of 13, please contact us at [privacy@apwip.com](mailto:privacy@apwip.com).

#### Sharing your information.

We may share your information with our affiliated companies. We may share Personal Information about you to unaffiliated third parties: (1) if you request or authorize it; (2) if the information is provided to help complete a transaction for you; (3) if the information is provided to comply with the law, applicable regulations, governmental and quasi-governmental requests, court orders or subpoenas, to enforce our Terms of Use or other agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection etc.); (4) if the disclosure is done as part of a purchase, transfer or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, customer information may be one of the transferred assets); (5) if the information is provided to our agents, outside vendors or service providers to perform functions on our behalf (e.g., storing or analyzing data), providing marketing assistance, providing customer service, processing orders, etc.); or (6) as otherwise described in this Policy.

We will only transfer your Personal Information to trusted third parties who can demonstrate a commitment to compliance with the technical and organization security measures. We do not share your information with third parties for their marketing purposes. We may disclose your non-private, aggregated, or otherwise non-personal information, such as usage statistics of our Products, to our affiliates and third parties.

Where third parties are processing Personal Information on our behalf, they will be required to agree, by contractual means or otherwise, to process the Personal Information in accordance with the applicable law. This contract will stipulate, amongst other things, that the third party and its representative shall act only on our instructions, or as permitted by law.

#### Security.

We use reasonable technical, administrative and physical measures to protect information contained in our system against misuse, loss or alteration. The Personal Information that you provide to us is stored on servers, which are located in secured facilities with restricted access, and protected by protocols and procedures designed to ensure the security of such information. We use standard SSL technology to protect information being transferred to our Site. However, no server, computer or communications network or system,

or data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect user information, we cannot ensure or warrant the security of any Personal Information you transmit to us. It is your responsibility to keep any usernames, passwords, or other log-in information safe. If we receive instructions using your log-in information, we will consider that you have authorized the instructions.

#### Where we store your information.

The information and data that we collect from you may be transferred to, and stored at, our servers in the United States of America or abroad. It may also be processed by staff operating in the United States, in your home country, any countries where the Company's affiliates are located, or the country where our suppliers and affiliates are located. Where Personal Information that is subject to the GDPR is shared with a third party located in a country that has not been deemed to provide an adequate level of protection for Personal Information, the contract in place with the relevant third party will incorporate an alternative appropriate safeguard (such as approved Standard Contractual Clauses). If you wish to obtain a copy of the relevant appropriate safeguard, please contact [privacy@apwip.com](mailto:privacy@apwip.com).

#### Links to other sites.

We may permit others to link to this Site or to post a link to their site on ours. We do not endorse these sites and are not responsible for other sites or their privacy practices. Please read their privacy policies before submitting information.

#### Accessing your Personal Information and updating it.

Wherever you are based, you may request that we correct, update, delete, or amend the Personal Information we hold about you. Contact us by email ([privacy@apwip.com](mailto:privacy@apwip.com)) if you wish to update your Personal Information. Please know that before we can make any changes to your information, we must confirm and authenticate that you are the data subject making the request for changes and we may request information from you to validate your identity. Where required, we will comply with your request within 45 days. If we deny your request, you will have the opportunity to appeal it, or appeal any other unresolved inquiries, complaints, and disputes.

Subject to any legislation which might, from time to time, oblige us to store Personal Information for a certain period of time, we will respect your wishes to correct inaccurate Personal Information or delete Personal Information. Otherwise, we will hold your Personal Information for as long as we believe it will help us to achieve our aims as detailed in this Policy. There may be circumstances where, for legal or compliance reasons, we are not permitted to delete information.

If, having agreed to receive marketing messages, you no longer wish to do so, you can update your preference at any time by "unsubscribe" using the instructions in any email you receive from us. This will not stop us from sending emails about your account or your transactions with us.

#### Your California privacy rights

We do not share personal information with third parties for their direct marketing use.

California residents can read our California Privacy Notice here [link] to learn about their rights and how to exercise them.

#### Your European and UK privacy rights

**For individuals within the EEA or UK only.** In addition to the above, under the GDPR, in certain circumstances, you have the right to: (a) request access to any Personal Information we hold about you and related information, (b) obtain without undue delay the rectification of any inaccurate Personal Information, (c) request that your Personal Information is deleted provided the Personal Information is not required by us for compliance with a legal obligation under European or Member State law or for the establishment, exercise or defense of a legal claim, (d) prevent or restrict processing of your Personal Information, except to the extent processing is required for the establishment, exercise or defense of legal claims; and (e) request transfer of your Personal Information directly to a third party where this is technically feasible.

In addition, where you believe that the Company has not complied with its obligation under this Privacy Policy or European law, you have the right to make a complaint to a Data Protection Authority, such as the UK Information Commissioner's Office or the Data Protection Commissioner in the Republic of Ireland.

#### Contacting us.

This Site is owned and operated by the Company. You can contact us at AP Wireless Infrastructure Partners, LLC, 4250 Executive Square, Suite 900, La Jolla, CA or by emailing [privacy@apwip.com](mailto:privacy@apwip.com).