# Privacy Policy

Effective Date: July 2, 2026

## Introduction

At DLC Management Corporation (“DLC,” “we,” “us,” “our”), your privacy is of utmost importance to us. We are committed to protecting your personal information and ensuring that your data privacy rights are respected. This Privacy Policy (“Privacy Policy”) explains the types of personal information we collect, how we process it, and the steps we take to safeguard your data collected through our websites located at https://dlcmgmt.com/, https://nwsarchitects.com/, https://renovobuilds.com/, or wherever this Privacy Policy is posted (the “Website”).

We encourage you to read this Privacy Policy carefully to understand our personal information practices. By using our Website and our services, you consent to the collection, use, and disclosure of your personal information in accordance with this Privacy Policy.

## What Do We Mean By “Personal Information” and “Personal Data”?

“Personal information” or “personal data” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal information that is aggregated (e.g., compiled to create statistics that cannot identify a particular individual) or de-identified (all identifiers obscured such that it cannot be linked to a particular individual) is not considered “personal information” for the purposes of this Privacy Policy

## Information We Collect and How We Collect It

We may collect the following types of personal information from you:

- Identifiers: Your full name, physical address, email address, and phone number, when you complete forms on our Website to request information, book an appointment, or register for an event. We also may collect your age, gender, and preferences when you voluntarily provide this information to us or participate in a survey.
- Internet or other electronic network activity: When you visit our Website, or interact with our advertisements and emails, we may use cookies and similar technologies (“cookies”) to collect information about your location, your activities on our Website, your interaction with our advertisements and our emails, information about your device, and log information. These cookies may collect Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages (the pages you come from and go after leaving the Website), the files viewed through our Website (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data.

Our commitment to your privacy includes transparency about the data we collect and how we use it. This section outlines the technologies and third-party services that assist us in collecting data to improve and personalize your experience on our Website.

## Analytics & Traffic Management

HubSpot: We use HubSpot for marketing automation and analytics. HubSpot helps us understand how visitors interact with our Website, enabling us to tailor our content and marketing strategies more effectively. HubSpot may collect data about your browsing activities but does not gather any personal information. The data collected is encrypted and anonymized to ensure your privacy.

Cloudflare Bot Management: To enhance Website security and performance, we utilize Cloudflare’s Bot Management services. This tool helps us identify and manage bot traffic, ensuring a smoother and safer user experience. The data collected by Cloudflare is strictly related to Website traffic patterns and does not include personal information. All data is subjected to one-way encryption, further protecting your anonymity.

Google Analytics: We use Google Analytics to gather insights into how users navigate and interact with our Website. This tool uses cookies containing unique identifiers to differentiate between new and returning visitors, helping us analyze user behavior across browsing sessions.

For more information on Google's privacy practices, please go to https://policies.google.com/technologies/partner-sites and to opt out of data recording and analysis by Google Analytics on the Website, please visit https://tools.google.com/dlpage/gaoptout.

Note that the opt-out is specific to Google Analytics activities and does not affect the activities of other ad networks or analytics providers that we may use.

How long these cookies stay on your device depends on what they do. For example, some cookies only work while you are visiting the Website and get deleted when you are done (session). Others may stay on your device unless you choose to delete them (persistent). Cookies may be placed by us (first party) or by other businesses (third party) when you visit the Website or other online properties

## Advertising and Social Media

We employ the use of various social media and advertising platforms, including Facebook Pixels, LinkedIn, and Adsense, to measure the effectiveness of our advertising campaigns and to customize the advertising content you see. These enable us to track user actions after they are redirected to our Website by clicking on an advertisement. The information collected through these tools are anonymized, ensuring that it cannot be linked back to individual users.

## Your Choices and Control

Advertising Opt-Out: In the U.S., you may opt-out of companies participating in the Digital Advertising Alliance ("DAA") program by opting out at https://optout.aboutads.info, https://youronlinechoices.eu/, and https://youradchoices.ca/en/tools. For information and to download DAA's AppChoices tool, see https://youradchoices.com/appchoices. Note that opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver ads tailored to your preferences and usage patterns.

Browser Settings: You may be able to block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. Check your browser's HELP menu to learn the correct way to change or update your cookies. Please see your mobile phone's manual for information on how to do this on your phone's browser.

| Browser | Cookie Management Link (as of the date of this Privacy Policy) |
|---|---|
| Google Chrome | https://support.google.com/chrome/answer/95647?hl=en |
| Firefox | https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&redirectlocale=en-US |
| Opera | https://help.opera.com/en/latest/web-preferences/ |
| Microsoft Internet Explorer | https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ede5947fc64d |
| Apple Safari | https://support.apple.com/en-il/guide/safari/sfri11471/mac |
| Microsoft Edge | https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09 |

Please note that if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our Website and services.

## “Sale” and “Sharing” of Personal Information

We do not sell your personal information for monetary compensation, but we may use advertising and analytics cookies, which may be considered a “sale” or “sharing” of personal information as those terms are defined under applicable privacy laws, such as the California Consumer Privacy Act. The personal information we “sell” or “share” is limited to your identifiers and internet or other electronic network activity information. At any time, you can opt out of the “sale” or “sharing” of your personal information by emailing us at privacy@dlcmgmt.com.

## Browser “Do Not Track” Signals

Some browsers offer a “do not track” (“DNT”) option. Because no common industry or legal standard for DNT has been adopted by industry groups, technology companies, or regulators, we do not respond to DNT signals. We will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

## How We Use Your Information

We use your personal information for the following purposes:

- To provide you with the services, information, or assistance with your request.
- To improve our Website, services, and customer support.
- To personalize your experience on our Website and provide you with relevant content.
- To communicate with you about appointments, events, and updates.
- To comply with legal and regulatory requirements.
- To disclose your information to third parties to the extent permitted by law.

## Information Disclosure

We may disclose the personal information we collect to trusted third parties for a business purpose, including to:

- Third-party service providers who assist us with our operations, such as data hosting and processing: We may share your information with third parties who provide services on our behalf to help us with our business activities. This may include: website hosting, providing customer service, analyzing interactions with the Website and sending and analyzing our marketing communications, setting cookies for marketing and analytics purposes, conducting research and analysis, and providing cloud computing infrastructure.
- Law enforcement or regulatory authorities, when required by law: In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose your personal information as required by law (such as to comply with a subpoena or other legal process), when we believe in good faith that disclosure is necessary to protect our rights, when we believe there is a violation to any of our terms or other agreement with us, to protect your safety or the safety of others and minors, to investigate fraud, to respond to a government request.
- Process a merger, sale, or acquisition: If we are involved in a merger, acquisition, or sale of all or a portion of our assets or if we are involved in bankruptcy or liquidation proceedings, your personal information may be one of the assets transferred.
- Prevent fraud and abuse: We may disclose information to prevent or detect fraud or to address technical issues and if we believe it is necessary to investigate, prevent, or take action regarding situations that involve abuse of the Website or its infrastructure. The legal basis for this is our legitimate interest in maintaining the security of our Website.
- Any third party when we obtain your consent for that disclosure.

## Third-Party Websites

Our Website may contain links to websites owned and operated by third parties. After you leave our Website, we have no control over the information collected from or about you on those third-party websites. Please be aware that we are not responsible for the privacy practices of these websites. The use of your information by third parties is subject to their privacy policies and terms of use. We encourage you to review their privacy policies before providing them with your personal information.

## SMS Messaging Opt-In and Opt-Out Process

Opt-In to SMS Messages: By opting into SMS from a web form or other medium, you are agreeing to receive SMS messages from DLC Management Corporation. This includes SMS messages for conversation purposes. Message frequency varies. Message and data rates may apply. Message HELP for assistance. Reply STOP to any message to opt out.

By texting DLC Management Corporation at 914-631-3131, you agree to receive conversational SMS messages from DLC Management Corporation. Reply STOP to opt-out. Reply HELP for support. Message & data rates may apply. Messaging frequency may vary.

Opt-Out of SMS Messages: If you wish to stop receiving text messages from DLC, you can opt out at any time by texting the word STOP or OPT OUT to the number from which you received our messages. Upon doing so, you will receive a confirmation message indicating that you will no longer receive text messages from us. Opting out of SMS messages will not affect your receipt of important transactional messages from DLC.

SMS Consent and Phone Numbers: We respect your privacy regarding SMS communication. We do not share your phone numbers or SMS consent with third parties. For assistance, contact our customer service at privacy@dlcmgmt.com.

## Email Marketing Unsubscribe Process

Subscription to Marketing Emails: By providing your email address, you agree to receive promotional and informational emails from DLC and affiliated companies, including Renovo Construction and NWS Architects. This may include newsletters and announcements about our services.

Unsubscribe from Marketing Emails: If you no longer wish to receive marketing emails from us, you may unsubscribe at any time by clicking the "Unsubscribe" link at the bottom of any marketing email from DLC, Renovo Construction, or NWS Architects. Please allow up to 48 hours for your request to be processed.

Each company maintains its own marketing email list. If you unsubscribe from a marketing email branded "DLC," "Renovo Construction," or "NWS Architects," you will only be removed from that specific company's marketing email list. You may continue to receive marketing emails from the other DLC-affiliated companies unless you separately unsubscribe from their respective email communications.

Please note that even after unsubscribing from marketing emails, you may still receive transactional, operational, account-related, or service-related communications regarding your account, transactions, or relationship with DLC and its affiliated companies.

## Changes to The SMS and Email Communication Policy

DLC reserves the right to modify this SMS and Email Communication Policy at any time. We encourage you to review this policy periodically for any changes. Your continued use of our SMS and email services after any modification to this policy will constitute your acceptance of such modification.

For any questions or concerns regarding this policy or our practices, please contact us at privacy@dlcmgmt.com.

## Disclaimer Regarding Video Content

The Website may contain video content, audiovisual content, or content of a like nature (collectively, “Video Content”). Video Content is provided for the purpose of enhancing the user experience on the Website and is, therefore, provided in connection with our business activities. DLC is not in the business of renting, selling, or delivering Video Content in a commercial manner. By using the Website, you agree that DLC is not a “video tape service provider” as defined in the Video Privacy Protection Act (“VPPA”), 18 U.S.C.A. § 2710 or similar state laws.

Further, the Website may utilize online tracking technologies and code-based tools, including social media pixels, software development kits, and cookies that track information about your activity on the Website (collectively, “Targeting Tools”). Targeting Tools may result in information about your activity on the Website being transmitted from your browser to DLC and to third parties, which, in turn, may result in the display of targeted advertisements on third-party websites. Whether Targeting Tools on the Website result in your browser’s transmission of information to third parties depends on a number of factors that may be outside of DLC’s knowledge or control, including what third-party websites you use, what information you have provided to such third parties, and whether (and the extent to which) you have limited the use of cookies by the operators of third-party websites. As such, you hereby acknowledge and agree that, if Targeting Tools on the Website result in your browser’s transmission of information to third-party websites: (i) such transmissions do not constitute a “knowing disclosure” of “personally identifiable information” by DLC under the VPPA; and (ii) you will not initiate any litigation or otherwise assert any claim against DLC based, in whole or in part, on such transmissions, whether under the VPPA, the California Invasion of Privacy Act (Cal. Penal Code § 630 et seq.), or any other statute, regulation, or cause of action.

## Data Security

The security of your personal information is important to us. We implement reasonable technical and organizational security measures to protect the personal information submitted to us, both during transmission and once it is received. DLC takes steps to ensure that such data remains private and confidential. We restrict access to personal information to DLC employees, contractors, and agents who need to know that information in order to operate, develop, or improve our Website. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Please understand, however, that no data transmissions over the Internet are guaranteed to be 100% secure due to the inherent risks of data transmission over the Internet. Consequently, we cannot ensure or warrant the security of any information you transmit to us, and you understand that any information that you transfer to us is done at your own risk. If we learn of a security system breach, we may attempt to notify you, including electronically, so that you can take appropriate protective steps. By using the Website or providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Website. We may post a notice via our Website if a security breach occurs. We may also send an email to you in these circumstances, at the email address you have provided to us. If you have any questions about the security of your personal information, you can contact us via the contact information below.

## Data Retention

We may retain your information for as long as needed to provide you with the Website, comply with our legal obligations, resolve disputes, and enforce our agreements. In certain circumstances, we may be required by law to retain your personal information, or may need to retain your personal information in order to continue providing access to the Website. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information; the potential risk of harm from unauthorized use or disclosure of the personal information; the purpose for which we use the personal information; whether we can achieve the purposes through other means; and the applicable legal requirements. If we de-identify personal information, we will maintain and use the information in de-identified form and not attempt to re-identify the information except as required or permitted by law.

Even if you delete an account you have with us, keep in mind that the deletion by our third-party providers may not be immediate, and that the deleted information may persist in backup copies for a reasonable period of time.

## Children’s Privacy

Our Website is not intended for children under the age of 18. We do not knowingly collect personal information from children under 18. If you are under 18, please do not use the Website and do not provide any personal information to us. If we learn that we have collected personal information from a child under 18, we will delete that information as quickly as possible. If you believe that a child under 18 may have provided us with personal information without parental consent, please contact us at privacy@dlcmgmt.com.

## Data Transfers

The Website is hosted in the United States. In order to communicate with you about content, the information that we collect from you may be transferred to, stored, used, and processed by DLC in the United States or one of our service providers based in the United States or outside of the United States. Such entities may be engaged in, among other things: (i) preparing and sending newsletters or emails to which you may subscribe; and (ii) the provision of support services.

If you are visiting from the European Union or other regions with laws governing information collection and use that may differ from United States law, please note that you are transferring your personal information to the United States. The laws of some countries may not provide the same levels of protection of personal information as your home country, particularly if you are a resident in the European Union. By using the Website, you agree to the collection, transfer, storage, use, and processing of your personal information for the purposes described in this Privacy Policy. When you provide personal information to us or our service providers or vendors, you consent to the processing of your information in the United States as the Website is operated in the United States. We will take reasonable steps to ensure that your personal information is treated securely in accordance with this Privacy Policy, and that all personal information you provide to us is stored on our secure servers or those of our service providers.

YOU ACKNOWLEDGE THAT THE LAWS OF THE UNITED STATES TREAT YOUR PERSONAL INFORMATION IN A MANNER THAT MAY BE SUBSTANTIALLY DIFFERENT FROM, AND LESS PROTECTIVE THAN, THE TREATMENT REQUIRED UNDER THE LAWS OF OTHER COUNTRIES AND JURISDICTIONS. IF YOU DO NOT WANT YOUR PERSONAL INFORMATION TRANSFERRED TO THE UNITED STATES, YOU SHOULD NOT SHARE YOUR PERSONAL INFORMATION WITH US, OR MAKE USE OF THE WEBSITE.

TO THE EXTENT ALLOWED BY THE LAW OF THE COUNTRY IN WHICH YOU ARE LOCATED, YOU EXPRESSLY WAIVE ANY RIGHT YOU MAY HAVE TO REQUIRE US TO TREAT YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE LAWS OF ANY COUNTRY OR JURISDICTION OTHER THAN THE UNITED STATES. HOWEVER, THE FOREGOING WAIVER MAY NOT BE LEGALLY BINDING IN SOME COUNTRIES, SUCH AS THE MEMBER STATES OF THE EUROPEAN UNION. TO THE EXTENT IT IS NOT LEGALLY BINDING IN THE COUNTRY IN WHICH YOU ARE LOCATED, THE FOREGOING WAIVER DOES NOT APPLY TO YOU.

## Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our Website. Your continued use of our Website and services after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

## Your State Privacy Rights

Depending on applicable state law, you may have certain rights, as outlined below. We will fulfill your request to exercise any of these rights within the applicable time period prescribed by such laws. You can exercise these rights by contacting us as outlined below.

Residents of California have the following rights:

- You have the right to know and right to access information about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties with whom we share such

information. You also have the right to know if we have sold or shared your personal information. You may also request a copy of the personal information we have collected, and upon request, we will provide this information to you in readily usable electronic form.

- You have the right to request the deletion of your personal information, subject to certain exceptions.
- You have the right to opt out of the “sale” or “sharing” of your personal information to third parties. This includes opting out of targeted advertising.
- You have the right to correct your personal information if inaccurate.
- You have the right to limit the use and disclosure of your sensitive personal information if we use such information to infer characteristics about you. Note that for precise geolocation information collected through a mobile device, you will need to update your settings. To do this on an iPhone, (1) go to Settings > Privacy > Location Services > and choose an app; (2) Select the app > tap on “location;” (3) Scroll down and slide the “Precise Location” toggle to Off. To do this on an Android, (1) go to Location Services > Google Location Accuracy; and (2) Toggle Improve Location Accuracy to Off.
- You have the right to not be discriminated against for exercising any of these rights, including where financial incentives are offered.

Submit a Consumer Privacy Request. To exercise any of the above rights, please submit a verifiable consumer privacy request to DLC by email: privacy@dlcmgmt.com

Verification. We cannot respond to your request to know, access, question the result of profiling, limit the use of, correct, or delete your personal information or provide you with a copy of your personal information unless we can verify your identity and your authority to make the request and confirm that the personal information relates to you. A verifiable consumer privacy request must:

- provide sufficient information that allows us to reasonably verify you are the person, or an authorized representative of the person, about whom we have collected personal information; and
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Authorized Agent. You may, under certain circumstances, authorize another individual or a business, called an Authorized Agent, to make a verifiable consumer privacy request on your behalf. If you wish to have an Authorized Agent make a verifiable consumer privacy request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent, and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

DLC’s Response. We endeavor to respond to a verifiable consumer privacy request with the time period prescribed by law. If we require more time, we will notify you in writing of the reason and extension period. We will deliver our written response by mail or electronically, at your option. If we cannot comply with part or all of your request, we will explain the reasons in our response.

We do not charge a fee to process or respond to your verifiable consumer privacy request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Appeals. You also have the right to appeal a denial of your request by contacting us as described in our notice of denial.

## California “Shine the Light” Law

California residents have the right to request certain information regarding our disclosure of personal information to third parties for their own direct marketing purposes, if we do so. To make such a request, please contact us at privacy@dlcmgmt.com. Please indicate in your request that you are a California resident making a “Shine the Light” inquiry. You also may opt out of any such sharing of your personal information to third parties for their own direct marketing purposes by sending an email to privacy@dlcmgmt.com.

### Nevada Disclosure

Residents of Nevada have the right to opt out of the sale of certain personal information to third parties. We currently do not sell your personal information as defined by Nevada law.

## Privacy Rights for the European Economic Area, the United Kingdom, and Switzerland

We process personal data as that term is defined in the European Union's General Data Protection Regulation ("GDPR") and the equivalent UK law. If you are located in the EEA, U.K., or Switzerland, you have the following rights:

- You have the right to access information about the categories of personal data we have collected about you. You may also request a copy of the personal data we have collected, and upon request, we will provide this data to you in electronic form or transfer it to a third party.
- You have the right to correct your personal data if inaccurate.
- You have the right to request erasure of your personal data when such data is no longer necessary for the purposes for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- You have the right to restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- You have the right to object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- You have the right to obtain information about, and a copy of, the safeguards we use to transfer personal data across borders.

In processing personal data, we may rely upon the following lawful bases:

- Consent. We may process personal data with the consent of the individual whose data is being processed and/or in reliance upon the consent of the administrator of the account, who must affirm that they have obtained appropriate consent from all participants. This includes when we offer our services to you which you have requested, and when we administer a survey, or feature of our Website that you have elected to take part in.
- Contract. When we enter a contract with you and/or an administrator for your account, we process personal data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract. This is necessary for us to provide the Website and our services to you.
- Vital interests. In a case where the personal data is required to protect your vital interests or the vital interests of another natural person, then this may be used as the lawful basis of the processing. For example, we may need to process personal data in the event of a pandemic.
- As required by law. We may process personal data as required to comply with legal obligations to which we are subject for the purpose of compliance with EEA, UK, or Swiss public, governmental, judicial, or other regulatory authorities. This could include where we are legally required to disclose your information to third parties.
- For legitimate business purposes. This includes, but is not limited to, legal compliance and the purposes described above. This may also include where we use your personal data to understand your usage of our Website, improve the content of our Website and services, and improve the user experience generally.

Users who are located in the European Economic Area ("EEA"), the European Union, the U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the relevant supervisory authority in their

country of residence. Contact details for data protection authorities are available here:

- In the EEA: https://edpb.europa.eu/about-edpb/about-edpb/members_en
- In the U.K.: https://ico.org.uk/global/contact-us/contact-us-public/
- In Switzerland: https://www.edoeb.admin.ch/edoeb/de/home/deredoeb/kontakt.html

If you would like to exercise any of these rights, please contact us at the information provided below.

## Contact Us

If you have any questions or concerns about this Privacy Policy or our data privacy practices, please contact us at:

DLC Management Corporation

Attn: General Counsel

565 Taxter Road, 4th Floor

Elmsford, New York 10523

Email: privacy@dlcmgmt.com