

RAIN.CLUB PRIVACY POLICY

Operated by CRE Media III, LLC (a Florida limited liability company)

Effective Date: November 28, 2025

CRE Media III, LLC (“**CRE Media**,” “**Rain.club**,” “**we**,” or “**us**”) operates the Rain.club website, the Rainmakers community, and related tools and services focused on commercial real estate education and referrals (collectively, the “**Services**”).

This Privacy Policy (“**Policy**”) explains how we collect, use, disclose, and otherwise process personal information, and the rights and choices you may have regarding that information.

Your use of our Services and any dispute over privacy is subject to this Policy and our Terms of Service.

1. SCOPE

This Policy applies to personal information we process relating to:

- Users of our website **Rain.club** and any other sites where this Policy is posted;
- Members of the Rainmakers community, including free and paid members;
- Individuals who register for or receive training, calls, events, or content from us;
- Individuals who communicate with us (for example, via email, chat, or online forms); and
- Prospective members or users who request information about our Services.

This Policy does not apply to:

- Job applicants, employees, or contractors of CRE Media; or
- Third-party websites, platforms, or services that we do not control.

2. PERSONAL INFORMATION WE COLLECT

We collect personal information from you, from third parties, and automatically, as described below.

A. Information You Provide Directly

The types of information you may provide include:

- **Registration and Account Information.**
Name, email address, username, password, phone number, membership level, and other account details.

- **Profile and Referral Information.**

Information about your business, markets you operate in, referral activity, and other details you choose to include in your profile or share with us.

- **Payment and Billing Information.**

If you purchase a paid membership, we may collect billing contact details (name, address, email) and payment-related information (which may be processed through a third-party payment processor).

- **Communications and Support.**

Messages, emails, chats, or other communications you send to us, including feedback, support requests, or questions.

- **Event / Program Participation.**

Information related to webinars, training sessions, or other programs, including registrations, attendance, and participation.

- **Surveys and Forms.**

Information you provide when completing surveys, questionnaires, or forms.

B. Information We Collect from Third Parties

We may receive information about you from:

- **Service Providers & Partners.**

Payment processors, analytics providers, referral platforms, or marketing partners who help us operate the Services.

- **Social Media or Third-Party Accounts.**

If you choose to link or log into the Services using a third-party account, that third party may share certain information with us, depending on their policies and your settings.

- **Lead Sources & Public Data.**

We may receive information about prospective users from lead-generation providers or from publicly available sources.

C. Information We Collect Automatically

When you access or use the Services, we and our service providers automatically collect certain information, such as:

- **Device & Usage Information.**

IP address, browser type, device type, operating system, access times, pages viewed, referring/exit pages, and similar usage information.

- **Activity Information.**

Clicks, page views, scrolls, time spent on pages, features used, logs, and other information about how you interact with the Services.

- **Cookies & Similar Technologies.**

We use cookies, pixels, and similar tracking technologies to collect and store information, as described in Section 6.

3. HOW WE USE PERSONAL INFORMATION

We use personal information for the following purposes:

1. **To Provide and Maintain the Services.**
 - Creating and managing accounts;
 - Providing access to content, community, and tools;
 - Processing membership payments and Referral Fees.
2. **To Communicate with You.**
 - Sending transactional emails about your account or membership;
 - Responding to your questions, support requests, or feedback;
 - Sending notices about changes to our Terms or this Policy.
3. **To Operate the Rainmakers Program.**
 - Tracking referrals and deal-related activity;
 - Administering Referral Fees and eligibility;
 - Preventing fraud or abuse of the program.
4. **Analytics, Improvement & Development.**
 - Understanding how users access and use the Services;
 - Evaluating and improving our content, features, and marketing;
 - Developing new offerings and functionality.
5. **Marketing and Promotions.**
 - Sending you emails or messages about products, services, or content we think may interest you (where permitted by law);
 - Measuring and improving our marketing.
6. **Security and Fraud Prevention.**
 - Monitoring, detecting, and preventing fraud, abuse, or security incidents;
 - Protecting the integrity of our systems and Services.
7. **Legal and Compliance.**
 - Complying with laws, regulations, legal processes, and lawful requests;
 - Enforcing our Terms of Service and protecting our rights.

We may also use personal information for any other purpose that we disclose to you at the time of collection or with your consent, where required.

4. HOW WE DISCLOSE PERSONAL INFORMATION

We may disclose personal information as reasonably necessary for the purposes described above, including:

- **Service Providers.**

We share information with third-party vendors who perform services on our behalf (for example, hosting, payment processing, analytics, email delivery, customer support).

- **Affiliates.**
We may share information with our affiliates (such as entities under common control), who will use it in accordance with this Policy.
 - **Community and Other Users.**
Certain profile or community information (such as your name, username, or messages you post in community spaces) may be visible to other members or users as part of the Service.
 - **Business Partners / Deal Counterparties.**
If you refer a deal or opportunity, we may share necessary information with lenders, borrowers, or other parties as needed to evaluate or close a transaction.
 - **Legal, Protection & Safety.**
We may share information where we believe it is necessary to:
 - (a) comply with applicable laws, legal processes, or lawful requests;
 - (b) protect the rights, property, and safety of CRE Media, our users, or the public; or
 - (c) enforce our Terms and policies.
 - **Business Transfers.**
In connection with a merger, acquisition, financing, sale of assets, bankruptcy, or similar event, your information may be disclosed or transferred as part of the transaction.
 - **With Your Consent.**
We may disclose personal information to other third parties with your consent or at your direction.
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5. AGGREGATE & DE-IDENTIFIED INFORMATION

We may create and use aggregated, anonymized, or de-identified data:

- For analytics, research, marketing, and Service improvement;
- To generate statistical or benchmarking information; and
- For any other lawful business purpose.

We will not attempt to re-identify such data where prohibited by law.

6. COOKIES, TRACKING, AND ANALYTICS

We and our third-party providers use cookies, pixels, and similar technologies to:

- Recognize you and your device;
- Remember your preferences;
- Analyze how you use the Services; and
- Support security and performance.

You can often control cookies through your browser settings (for example, blocking or deleting cookies). If you disable certain cookies, some parts of the Services may not function properly.

We may also use third-party analytics tools to help us understand how users interact with the Services. These tools may collect information such as IP address, device type, and browsing behavior.

7. YOUR PRIVACY CHOICES

You may have the following choices regarding your personal information:

- **Account Information.**
You can review and update certain account information by logging into your account settings (if available). You may also contact us at **support@rain.club**.
- **Marketing Communications.**
You can opt out of marketing emails by following the unsubscribe instructions in those emails or contacting **support@rain.club**. We may still send you transactional or account-related messages.
- **Cookies & Tracking.**
You can adjust your browser settings to delete or block cookies. Some browsers also offer “Do Not Track” signals; our Services may not currently respond to all such signals.

Depending on your jurisdiction, you may have additional rights, such as the right to access, correct, or delete certain personal information. You can contact us at **support@rain.club** for assistance.

8. CHILDREN’S PRIVACY

Our Services are not intended for children under 13. We do not knowingly collect personal information from children under 13.

If you believe we have collected information from a child under 13, please contact us at **support@rain.club**, and we will take appropriate steps to delete such information.

9. THIRD-PARTY WEBSITES & SERVICES

Our Services may contain links to third-party sites, platforms, or services that we do not control.

We are not responsible for the privacy practices of such third parties. We encourage you to review their privacy policies before providing any personal information to them.

10. INTERNATIONAL TRANSFERS

CRE Media III, LLC is based in the United States, and we may process your information in the United States and other countries that may have different data protection laws than your home jurisdiction.

Where required by law, we will implement appropriate safeguards to protect personal information transferred across borders.

11. SECURITY

We use reasonable administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, loss, or misuse.

However, no security method is perfect, and we cannot guarantee absolute security. You are responsible for maintaining the confidentiality of any account credentials and for notifying us promptly at **support@rain.club** if you believe your account has been compromised.

12. DATA RETENTION

We retain personal information:

- For as long as necessary to provide the Services, operate the Rainmakers program, and fulfill the purposes described in this Policy;
- As needed to comply with legal obligations, resolve disputes, and enforce our agreements; and
- As necessary for legitimate business needs.

When personal information is no longer needed, we may delete, anonymize, or aggregate it in accordance with applicable law and our internal policies.

13. CHANGES TO THIS PRIVACY POLICY

We may update this Policy from time to time. When we do, we will:

- Update the Effective Date at the top of this Policy; and
- Post the updated Policy on **Rain.club**.

In some cases, we may provide additional notice (such as by email or prominent notice on the site) if required by law or if the changes are material.

Your continued use of the Services after any changes become effective means you accept the updated Policy.

14. CONTACT US

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

Email: support@rain.club