

FACTS**WHAT DOES WALKER & DUNLOP INVESTMENT PARTNERS, INC. (WDIP) DO WITH YOUR PERSONAL INFORMATION?**

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| Why? | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. |
| What? | The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ■ Social Security number and employer identification number ■ transaction history and credit information and account balances ■ address, phone and asset and investment experience |
| How? | All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons WDIP chooses to share; and whether you can limit this sharing. |

| Reasons we can share your personal information | Does WDIP share? | Can you limit this sharing? |
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| For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| For our marketing purposes— to offer our products and services to you | Yes | No |
| For joint marketing with other financial companies | No | N/A |
| For our affiliates' everyday business purposes— information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes— information about your creditworthiness | Yes | Yes |
| For our affiliates to market to you | Yes | Yes |
| For nonaffiliates to market to you | Yes | Yes |

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| To limit our sharing | <ul style="list-style-type: none"> ■ Call 855.550.0007 —our menu will prompt you through your choice(s) ■ Visit us online: https://www.lighthouse-services.com/walkerdunlop ■ Mail the form below <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p> |
| Questions? | Call 303.802.3533 or go to https://www.walkerdunlop.com/services/investment-management |

Mail-in Form

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| | Mark any/all you want to limit: <i>(no mobile opt-in information will be shared with third parties for marketing or promotional purposes)</i> |
| | Name |
| | Address |
| | City, State, Zip |
| Mail To: | WALKER & DUNLOP INVESTMENT PARTNERS, ATTN: PRIVACY 2345 E. 3RD AVENUE, SUITE 300 DENVER, CO 80206 |

| Who we are | |
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| Who is providing this notice? | WALKER & DUNLOP INVESTMENT PARTNERS, INC. (WDIP) |
| What we do | |
| How does WDIP protect my personal information? | <p>We maintain a comprehensive information security program designed to protect the confidentiality and integrity of personal information. Our program includes administrative, technical, and physical safeguards, such as role-based access controls, multi-factor authentication, encryption of data in transit and at rest, continuous monitoring, and periodic independent assessments of our information security controls.</p> <p>We limit the collection and use of personal information to what is necessary to provide our services, operate our business, and comply with legal and regulatory obligations. We do not retain personal information for longer than necessary to fulfill these purposes, subject to applicable record retention requirements.</p> |
| How does WDIP collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ open an account or perform transactions ■ apply for services or use your account with us ■ seek advice about your investments <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p> |
| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See walkerdunlop.com/privacy-policy for more details.</p> |
| What happens when I limit sharing for an account I hold jointly with someone else? | One joint account holder may opt out on behalf of all holders of the account. |
| Third-Party Service Providers | We may share personal information with service providers that perform services on our behalf. We conduct risk-based due diligence on these providers and require them by contract to protect the confidentiality and security of personal information and to use it only for the purposes for which it was disclosed. |
| Incident Response | If under highly remote circumstances there is a Security Incident involving your personal information, then we maintain policies and procedures designed to detect, respond to, and recover from cybersecurity incidents and will notify affected individuals of incidents involving personal information as required by applicable law. |
| Definitions | |
| Affiliates | <p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Walker & Dunlop, LLC; W&D UK PVT LTD.; WD-GTE, LLC; WD-GeoPhy CRE Valuation, LLC; WDAAC, LLC; Zelman Partners, LLC</i> |
| Nonaffiliates | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>This includes financial services companies like insurance agencies or mortgage brokers; nonfinancial companies like retailers and membership groups; and other companies like non-profits.</i> |
| Joint marketing | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Our joint marketing partners include financial services companies.</i> |
| Other important information | |
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Per the Investment Advisers Act of 1940, books and records will be maintained for at least five years after the end of the fiscal year in which the record was created or last altered, whichever is more recent. Certain required records must be kept for longer periods of time. Opt outs will not effect nonpublic personal information sharing with parties necessary to service your account or conduct due diligence.

Do Not Call Policy. This notice is the WDIP Do Not Call Policy under the Telephone Consumer Protection Act. We do not solicit

via telephone numbers listed on the state or federal Do Not Call lists, unless the law allows. WDIP employees receive training on how to document and process telephone marketing choices. Consumers who ask not to receive telephone solicitations from Bank of America will be placed on the WDIP Do Not Call list and will not be called in future campaigns.

Call Monitoring and Recording. If you communicate with us by telephone, we may monitor or record the call.

For Nevada residents only. We are providing you this notice under state law. Nevada law requires we provide the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Avenue, Suite 3900, Las Vegas, NV 89101; Phone number: 702.486.3132; email: aginfo@ag.nv.gov; Walker & Dunlop Investment Partners, Inc. Attn: Privacy, 2345 E. 3rd Avenue, Suite 300, Denver Colorado 80206; Phone number: 855.550.0007; Click on "Contact Us" at walkerdunlop.com/privacy-policy.

Vermont: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of our corporate family, unless the law allows. We will not share information about your creditworthiness within our corporate family except with your consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.

California: Under California law, we will not share information we collect about you with companies outside of WDIP, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by law.