

Newmark | Data Privacy Program Policy Statement

Newmark Group, Inc. ("Newmark") has approved the following global policy with respect to Newmark and its subsidiaries on a global basis.

The following policy reflects Newmark's commitment to Data Privacy on a global basis with respect to all subsidiaries and business lines and forms part of its governance standards.

Our Commitment

Newmark is committed to conducting its business in line with the right to privacy set forth in the Universal Declaration of Human Rights (Article 12).

As such, we are committed to handling personal data responsibly and recognize the privacy rights of persons involved in our business dealings. Confidentiality and protection of customer and employee information are fundamental responsibilities. We take these matters seriously as we provide services globally to our customers and protect one of our most important assets - - our customers' trust.

Our Security Measures

We maintain administrative, technical, and physical safeguards that are designed to protect against loss, misuse, unauthorized access, disclosure, alteration, or destruction of the personal information we collect. We utilize Data Loss Prevention ("DLP") and manual monitoring of employee communications to protect unauthorized data from leaving the network. The measures we may take to provide appropriate levels of data protection may also include approved standard contractual clauses, intragroup agreements, and other contractual measures designed to cause recipients of personal information to protect it.

Our Data Privacy Program

The Privacy Office is responsible for creating a culture of data protection awareness and embedding best practices globally. We have a dedicated Head of Privacy and Data Protection who reports to senior management. The Privacy Office interprets privacy regulations and facilitates the development, implementation, and maintenance of policies and procedures while monitoring program compliance in addition to investigation and tracking of privacy and data protection incidents and breaches.

The importance of data privacy and confidentiality is reflected in our program, including the following:

- Regular employee training on the General Data Protection Regulation ("GDPR") and privacy principles in applicable jurisdictions;
- Written policies and operating procedures on data privacy and request management including our internal employee privacy policy and our online public privacy statement located at <https://www.nmrk.com/privacy-statement>;
- Ongoing review and updating of our privacy program to align with industry and best practices;
- Compliance with data subject requests to access, correct and delete personal information in accordance with applicable law;
- Establishing mechanisms for data subjects (employees and clients) to raise concerns about their personal data and privacy as well as a right of access to personal information rights to correct or amend such information and the right to request deletion of such personal information;
- Clear and effective governance including escalation procedures around data privacy matters which are outlined in communications and reports to senior management and, as appropriate, to the Board of Directors; and
- Prompt and responsive investigations of data privacy breaches and any required reporting and/or correction actions.