

1. About Us and This Notice

Protecting your private information is a priority. This Privacy Policy governs data collection and usage for this website. By using this website, you provide and entrust us with certain personal information (which we refer to herein as “your information”). We understand that your information is important to you, and we take your privacy and data protection concerns seriously. This Privacy Notice (“Notice”) is meant to help you understand how we collect, use, and share your information and how you can exercise the choices and rights you have to your information.

2. Applicability and Scope of This Notice

This Notice is applicable to all websites that link to this Notice (collectively, the “Websites”), virtual platforms and services, and any other interactions (e.g. customer service inquiries, webinars, conference) you may have with this Service to better assist your tenancy needs.

This Notice applies only to your personal information, which is information that is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual or household. For the purposes of this Notice, your information does not include aggregate or de-identified information maintained in any form that does not identify you or cannot be reasonably linked to an individual. The operator of this website, Entrata, provides certain Services on behalf of many landlords who operate within the real estate industry, and maintains its own Privacy Policies for your protection.

3. Collected Information

When you use or interact with Entrata’s Websites or Services, it may collect information that you provide, usage information, and information about your device. It may also collect information about you (and combine it with other information we have about you) from other sources who collect your information on our behalf (e.g., service providers). See below for examples of information the Websites or Services may collect or receive. You may receive supplemental information about data collection or privacy practices in disclosures about specific Services or circumstances, or in some cases, at the same time the Websites or Services collect personal information from you.

3.1. Information You Provide

- **To use the Services.** When you use these Websites, create an account or profile in one of the Service platforms, or when We utilize certain Services as the Property Owner, for example, to conduct a background screening, you may provide *personal identifiers* (e.g., your first name, last name, email address, date of birth, phone number, postal address, IP address, account name), *tenant access records* (e.g., username and password, payment information, employment, job title, business email address, educational enrollment), other *sensitive personal information* (e.g., social security number, driver's license number, passport number, tax identification number, government issued ID, national ID card), and other similar personal information.
- **To provide payment services.** To use the Website's payment services, you may be required to provide us with *financial and other sensitive personal information*, e.g., your bank account number, online bank account login, and credit card information. The Websites and Services may also capture additional information when you make payments, such as card type, transaction type, and payee information.
- **To comply with all corporate policies and regulatory obligations.** In connection with (a) maintaining reasonable data protection safeguards, including the security of our services, (b) fulfilling "know your customer" processes, required for certain payment services, and (c) complying with other various regulatory requirements related to our Services, you may be required to provide us with *personal identifiers* (e.g., first name, last name, email address, date of birth, phone number, IP address, account name), other *sensitive personal information* (e.g., social security number, tax identification number, images of your driver's license, government issued ID, passport, national ID card), and other similar personal information.
- **To participate in virtual communities.** When you participate in our communities (help centers, blogs, forums, etc.), you may choose to voluntarily disclose personal information, which may be used to identify you, including *personal identifiers* (e.g., first name, last name, email address, phone number), and other similar information.
- **When you engage with online Services and teams.** You may provide the Websites or Services with *personal identifiers* (e.g., first name, last name, email address, phone number) and other similar information when you fill in forms, respond to surveys, participate in promotions or research opportunities, communicate with our customer service teams, or use other features of the Services.

3.2. Information Collected When Using the Websites and Services

- **Device Information.** When you access the Websites or use the Services, it may collect device information that can be used to identify you or your device. This *internet or electronic network information* may include IP address, hardware and software operating system type and version, browser type and version, crash data, and the pages you have viewed or engaged with before or after accessing the Websites or Services.
- **Commercial and activity information.** The Websites and Services may collect *commercial information* about how you use our Websites or Services, such as content accessed, services you have used or interacted with, date and time of account creation, account status, log in activity, transaction history, time viewed, and links clicked.
- **Geolocation data.** When you use some of the Websites or Services, it may collect *geolocation data* about your precise or approximate location based on your IP address, GPS, or nearby devices (e.g., Wi-Fi access points, cell towers).
- **Cookies and similar technologies.** The Websites and Services leverage common industry standard capabilities to facilitate feature rich service delivery using website cookies and tracking beacons. If you have any questions about the use of cookies, please refer to Entrata's Privacy Policy, in addition to the terms set forth herein for your opt-out options.

3.3. Information Collected from Other Sources

- **Public information.** The Websites and Services may collect information about you from publicly accessible sources, such as information posted about you on the internet, news stories, and information available from governmental entities.
- **Service providers and other parties.** Service providers and other parties provide the Websites and Services with essential services and information it needs to offer and operate the Services provided to your Landlord. These service providers and other parties include background check providers, financial service providers, marketing providers, recruiting and employment related providers, security providers, and other businesses. Personal information the Websites and Services obtain about you from these parties may include: criminal and credit history; information about your participation in third-party programs that provide things like insurance coverage and financial instruments; information to support marketing and advertising activities; information to review job applications and conduct employment interviews; and information about you provided by specific services, such as demographic and market segment information.
- **Data from other accounts.** Through the use of Entrata's Websites and Services, we may receive information from third parties if you use a third party service that connects to Entrata,

or if you connect a third party account to your Entrata account at any time. In these situations, you authorize that third party service to share your information with us. The specific personal information shared with us will depend on the third party's privacy practices, agreements the Websites and Services have with the third party, and any choices that you may make in sharing your information, and may include your name, email address, and any other information you agree to let the third party service share with us.

4. How We Use Your Information

4.1. Providing Management Services

We partner with Entrata work hard to provide our Communities with the features, functionality, and support they need to have an efficient, intuitive, and worthwhile experience. To do this, we use your information to:

- Verify your identity, authenticate your account, and maintain your account, settings, and preferences;
- Provide customer support and resolve questions and issues you have about our Services;
- Communicate with you about your use of our Services and notify you about upcoming changes or improvements to our Services;
- Process payments, verify bank account balances, and conduct background checks;
- Collect feedback regarding your experience;
- Understand and personalize your experience within our Services;
- Facilitate additional services and programs with third parties; and
- Operate surveys, sweepstakes, and other promotions.

4.2. Safeguarding Your Information and Our Services

Your privacy is extremely important to us. To do this, the Websites and Services use your information to:

- Conduct proactive monitoring of suspicious activity across our systems and platforms;
- Monitor and prevent unauthorized access to your information, and account for unlawful or other fraudulent activities;
- Conduct diligence on third parties to ensure they meet our strict security and data protection standards; and

- Continuously review and improve our security and data protection practices to protect information with which we are entrusted to conduct business.

4.3. Improving Your Services

Entrata and its commercial partners are constantly improving the Websites and Services to better serve you. To do this, we use your information to:

- Monitor engagement and interactions and gather data analytics to improve functionalities, operations, and processes, including our security practices, algorithms, and other modeling;
- Assess the capabilities of third party partners;
- Develop new products, features, partnerships, and services;
- Perform research, testing, and analysis; and
- Prevent, find, and resolve software bugs and issues.

4.4. Building the Community

To build our community and engage with our users, the Websites and Services may use your information to:

- Communicate with you about events, offers, and provide you with online information updates;
- Personalize and provide content, experiences, communications, and targeted advertising to promote our Services; and
- Provide content for public forums, such as bulletin boards, blogs, or chat rooms on our Websites or within our Services.

4.5. For Any Other Lawful, Legitimate Business Purpose

The Websites and Services may use your information for any other lawful, legitimate business purpose including, complying with legal obligations and other governmental demands; investigating and resolving disputes; and enforcing our Terms of Service and any other contracts.

5. How Information may be Shared

The Websites and Services do not sell your personal information to third parties for money, and will not act as a data broker. However, there may be a need to share your information with service providers, third parties, and other commercial users that rely upon the Websites and Services. This section explains when and why your information may be shared.

5.1. Service Providers

The Websites and Services use a variety of third-party service providers to help us provide all Services and to perform tasks on its behalf, and these third parties may require your information for such purposes. For example, service providers may help to: (a) verify your identity or authenticate your identification documents, (b) check information against public databases, (c) conduct background checks, fraud prevention, and risk assessment, (d) perform product development, maintenance, and debugging, (e) provide customer service, payments, or insurance services, (f) automate administrative tasks; and (g) provide analytics. Entrata maintains agreements with all such third parties and they are not permitted to use your information for any purpose other than to deliver the relevant services in a professional manner, and consistent with their legal, regulatory and other obligations. If you have any concerns, please let Management know immediately.

5.2. Legal and Regulatory Disclosures

The Websites and Services may disclose your information to courts, law enforcement, governmental authorities, tax authorities, or other third parties, if and to the extent Entrata and your Landlord are required or permitted to do so by law or if such disclosure is reasonably necessary: (a) to comply with any legal obligations, (b) to comply with a valid legal request or to respond to claims asserted against Entrata, the Landlord, or Property Management, (c) to respond to a valid legal request relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability, or (d) to enforce and administer our internal policies and protocols. Such disclosures may be necessary to comply with legal obligations, for the protection of your or another person's interests or for the purposes of keeping our Services secure, preventing harm or crime, enforcing or defending legal rights, or facilitating the collection of taxes.

5.3. Sharing Between Business Customers' Users

The Websites and Services may need to share certain information within that business account with other users that are authorized to access and use that business account. For example, account login information and other certain personal information may be visible by all members of the business account for purposes of confirming account permissions and users.

5.4. Corporate Affiliates

To enable or support the Websites and Services in providing you the Services, it may share your information within Entrata's corporate family of companies.

6. Information from Children

The Websites and Services are not directed at children and individuals under the age of 18 are not permitted to use these Services. We do not knowingly collect information from individuals under 18 years of age. If we find out that an individual under the age of 18 has given us personal information, we will take steps to delete that information. If you believe that an individual under the age of 18 has given us personal information, please contact L'Vina Hills at 215-574-8500.

7. Aggregate and De-Identified Information

As mentioned above, your information does not include information that is aggregated or de-identified. When we use or receive de-identified information, we maintain such information in a de-identified form and do not attempt to re-identify the information.

8. Retention of Your Information

The Websites and Services retain your information for no longer than necessary for the purposes for which it was collected, including for the purposes of satisfying any legal or reporting requirements, and in accordance with our legal obligations and legitimate business interests. To determine the appropriate retention period for your information, Entrata and its business customers consider the purposes for which everyone processes the information; the nature and sensitivity of the information; the potential risk of harm from unauthorized use or disclosure of the information; and any applicable legal and reporting requirements.

9. Security

The Websites and Services are continuously implementing and updating organizational and technical security controls to help protect your information against unauthorized access, loss, destruction, or alteration. Your Landlord and Property Management fully support Entrata's ongoing efforts to provide comprehensive security for its Websites and Services. Such controls may include industry standard

intrusion detection systems, encryption of data both while in transit over public networks (e.g., Internet) and while at rest (e.g., in a database or platform), and identifying and patching exploitable software and system vulnerabilities. Additionally, Entrata personnel are trained in safe data handling practices.

10. External Links

The Websites and Services may contain links to third party websites. These third party websites maintain their own policies regarding the collection and use of your information. Entrata, your Landlord, and Property Manager assume no responsibility or liability for the actions of such third parties with respect to their collection or use of your information. We encourage you to read the privacy policies of every website that you visit, including those you may reach through a link on our Websites or in our Services. We encourage you to be aware when you leave our Websites or Services and to read the privacy statements of each and every website you visit that collects your information.

11. State Specific Privacy Regulations

For California, Colorado, Connecticut, Delaware, Iowa, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Utah, and Virginia Residents, please be advised that additional disclosures and information regarding privacy practices are required as of law. Please refer to Entrata's Privacy Policy for additional disclosures. This Policy incorporates these Notice requirements by reference.

12. Cookie Policy

What Are Cookies?

Cookies are text files that are downloaded to your device when you visit a website. Cookies perform many different functions and we use them for a variety of reasons, including, to learn what content is popular, improve site experience, provide efficient webpage navigation, save user preferences, understand how you may interact with our Websites, and to serve you better ads on other sites.

Cookie Syncing

The Websites and Services may send and receive cookies, Pixels, or other online identifiers, on our Websites to associate cookies with certain third party partners. This practice involves allowing the Websites and Services' third party partners to use cookies and assign online identifiers to increase performance of ad campaigns.

Managing Cookie Preferences

You may manage your cookie preferences and opt out of certain cookies on the Websites by adjusting the service settings on Entrata's website.

Browser Cookie Management

Certain web browsers may allow you to manage your cookie preferences through their settings. Please see documentation related to your particular browser for more information.

"Do Not Track" Signals

Do Not Track ("DNT") signals are a way to keep your online behavior from being followed across the Internet by behavioral advertisers, analytics companies, and social media sites. As the industry lacks a comprehensive standard to implement such signals, we are unable to support DNT signals.

13. Miscellaneous Items

Limits On Use of Your Google User Data

Certain Services can be used to access Google data. Notwithstanding anything else in this Notice, if you provide our Services access to the following types of your Google data, our use of such data will be subject to the following restrictions:

- The Services will only use such access to read, write, modify, or control Gmail message bodies (including attachments), metadata, headers, and settings to provide a web email client that allows users to compose, send, read, and process emails and will not transfer this Gmail data to others unless doing so is necessary to provide and improve these features, comply with applicable law, or as part of a merger, acquisition, or sale of assets.
- The Services will not use Gmail data for serving advertisements.
- The Services will not allow humans to read your Google data unless we have your affirmative agreement for specific messages, doing so is necessary for security purposes such as investigating abuse, to comply with applicable law, or for our Services' internal operations and even then only when the data has been aggregated and anonymized.

14. Changes to This Notice

We may update this Notice from time to time as our Services change and privacy laws evolve. Changes to this Notice will be done online and the latest update will be reflected in the bottom right corner. If we determine, in our discretion, changes are material, we will notify you by some other method of communication, like email. When you use or interact with the Websites and Services, you are agreeing to the most recent terms of this Notice.

15. Contact

We hope this Notice answers all of your questions about our treatment and protection of your information, but to the extent you have further questions regarding this Notice, we invite you to (a) email us anytime at stjamesleasing@200wvs.com, Attn: L'Vina Hills; or (c) otherwise contact us via the methods or forms described in this Notice.