

## VennPoint Communities LLC

### Privacy Policy

**Last Updated:** May 1<sup>st</sup>, 2026

VennPoint Communities LLC, an Illinois limited liability company (“**VPC**,” “**we**,” “**us**,” or “**our**”), provides multifamily residential property management services. This Privacy Policy explains how we collect, use, disclose, and protect personal information in connection with our property websites, online leasing applications, applicant screening tools, resident portals, payment features, maintenance request features, communications, and related services (collectively, the “**Services**”).

Certain Services are provided through technology platforms operated by **Entrata, Inc.** (“**Entrata**”), including property websites, ProspectPortal, ResidentPortal, ResidentVerify, payment functionality, communications tools, and related features. Entrata may also provide its own terms, cookie preferences, accessibility statement, and privacy notices through the Services.

#### 1. Scope of This Privacy Policy

This Privacy Policy applies to personal information we collect or process from prospective residents, applicants, residents, guarantors, occupants, website visitors, and other individuals who interact with VPC or the Services.

This Privacy Policy does not replace or modify any separate notice, lease, rental application, screening disclosure, authorization, or other agreement that may apply to your relationship with VPC, a property owner, or a service provider.

#### 2. Personal Information We Collect

The information we collect depends on how you interact with us and the Services.

##### A. Information You Provide Directly

We may collect:

- Name, mailing address, email address, telephone number, and account credentials;
- Date of birth, Social Security number, driver’s license number, government identification, or similar identifiers;
- Rental application information, including household information, rental history, references, employment information, income information, pay stubs, bank statements, or other financial information;
- Information needed to evaluate eligibility, verify identity, conduct background checks, credit checks, or resident screening;
- Lease, guarantor, occupant, pet, vehicle, insurance, emergency contact, and move-in/move-out information;
- Payment-related information, such as billing details, payment history, and transaction records;
- Maintenance requests, resident communications, service requests, complaints, or other messages submitted through the Services;
- Any other information you choose to provide.

Payment transactions may be processed by third-party payment processors. VPC does not intend to directly collect or store full payment card numbers entered through the Services, but we may receive related billing, transaction, confirmation, or account information.

##### B. Information Collected Automatically

When you use property websites, portals, or related online Services, VPC, Entrata, and other service providers may automatically collect information such as:

- IP address, browser type, device type, operating system, device identifiers, cookie identifiers, and similar online identifiers;
- Pages viewed, links clicked, session activity, log-in activity, timestamps, referring websites, and other usage information;
- Approximate location derived from IP address;
- Cookie, pixel, analytics, and similar tracking technology information.

##### C. Information From Third Parties

We may receive information from:

- Entrata and related platform tools;
- Applicant screening, credit reporting, background check, identity verification, fraud prevention, or resident verification providers;
- Payment processors;
- Property owners and affiliated entities;
- Prior landlords, employers, references, guarantors, occupants, or other persons you identify;
- Public records, government sources, or other lawful sources.

#### 3. How We Use Personal Information

We use personal information for the following purposes:

- Operating property websites, applicant portals, resident portals, and related Services;
- Processing rental inquiries and applications;
- Conducting applicant screening, identity verification, credit checks, background checks, income verification, and fraud prevention;
- Making leasing, renewal, eligibility, and resident-management decisions;
- Preparing, signing, administering, and enforcing leases and related agreements;
- Processing rent, fees, deposits, utilities, and other payments;
- Managing resident accounts, maintenance requests, notices, communications, documents, and property operations;
- Providing customer service and responding to inquiries;
- Communicating about applications, leases, payments, maintenance, property operations, policy changes, and resident services;
- Complying with legal obligations, including fair housing, consumer reporting, tax, accounting, recordkeeping, litigation, and law-enforcement obligations;
- Protecting VPC, residents, properties, property owners, service providers, and others from fraud, security incidents, unauthorized activity, legal claims, or harm;
- Improving, maintaining, securing, and analyzing the Services;
- Marketing available properties and services, where permitted by law;
- Any other purpose disclosed to you at the time of collection or with your consent.

#### **4. Cookies, Analytics, and Online Tracking**

The Services may use cookies, pixels, web beacons, analytics tools, and similar technologies to operate the Services, remember preferences, measure performance, improve user experience, detect security issues, and, where applicable, support marketing or advertising.

Cookie preferences may be available through tools provided on the property websites, including Entrata's cookie preference tools. Some state privacy laws treat certain analytics or advertising-related disclosures as a "sale," "sharing," or "targeted advertising," even when personal information is not sold for money. Where required, you may opt out through cookie preference tools, "Your Privacy Choices" links, browser/device controls, or recognized opt-out preference signals such as Global Privacy Control.

#### **5. How We Disclose Personal Information**

We may disclose personal information to:

- Entrata and platform providers that host or operate the Services;
- Applicant screening, credit reporting, background check, identity verification, fraud prevention, and resident verification providers;
- Payment processors, banks, and financial service providers;
- Property owners, landlords, asset managers, investors, and affiliated entities, as needed for property management and ownership administration;
- Maintenance providers, contractors, utility providers, insurance providers, and other vendors involved in property operations;
- Professional advisors, including attorneys, accountants, auditors, consultants, insurers, and compliance advisors;
- Government authorities, courts, regulators, law enforcement, or other third parties where required or permitted by law;
- Successors or transaction parties in connection with a merger, financing, sale, transfer, restructuring, bankruptcy, receivership, or transition of management or ownership.

We do not sell personal information for monetary consideration. We may disclose online identifiers and internet activity information to analytics or advertising providers in a way that may be considered "sharing," "targeted advertising," or a "sale" under certain state privacy laws.

#### **6. Entrata and Third-Party Services**

Entrata provides the platform infrastructure for many of the Services. Entrata may process personal information on VPC's behalf and may also process certain information under its own terms, privacy notices, cookie policies, or legal obligations. Entrata publishes legal terms and privacy materials for ProspectPortal, ResidentPortal, and related services.

The Services may also link to or integrate with third-party websites, applications, payment processors, screening vendors, or other services. Their privacy practices are governed by their own policies.

#### **7. Security**

We use reasonable administrative, technical, and physical safeguards designed to protect personal information. Access to Entrata and related systems is limited to authorized VPC personnel and may include authentication controls such as multi-factor authentication.

No security measure is perfect. The FTC identifies sensitive information such as Social Security numbers, credit card or account data, and similar information as requiring appropriate safeguards because misuse can lead to fraud, identity theft, or similar harms.

## 8. Retention

We retain personal information for as long as reasonably necessary to fulfill the purposes described in this Privacy Policy, including to process applications, manage tenancies, administer leases, comply with legal obligations, resolve disputes, enforce agreements, maintain business records, and support legitimate operational needs.

Because much of the information is stored in Entrata’s platform, historical information may remain available to VPC while VPC uses Entrata’s services, subject to applicable law, contractual requirements, legal holds, and VPC’s retention practices.

## 9. Your Privacy Choices and Rights

Depending on your state of residence and applicable law, you may have rights to:

- Confirm whether we process your personal information;
- Access or obtain a copy of your personal information;
- Correct inaccurate personal information;
- Delete personal information, subject to legal exceptions;
- Opt out of sale, sharing, targeted advertising, or certain profiling;
- Limit certain uses or disclosures of sensitive personal information, where applicable;
- Appeal a denial of a privacy request, where applicable;
- Not be discriminated against for exercising privacy rights.

To exercise rights, contact us using the information in Section 13. We may verify your identity before responding. Authorized agents may submit requests where permitted by law, but we may require proof of authority and verification of the request.

## 10. Notice at Collection and Supplemental State Privacy Notice

This section applies where required by state privacy laws.

Category of Personal Information	Examples	Purposes	Disclosed To
Identifiers	Name, address, email, phone, IP address, account identifiers, SSN, driver’s license or ID number	Applications, screening, leasing, portals, payments, communications, security, legal compliance	Entrata, screening vendors, payment processors, property owners, service providers, legal/government parties
Personal records / financial information	Application information, income, employment, bank statements, pay stubs, billing/payment records	Applicant evaluation, leasing, payment processing, compliance, fraud prevention	Screening vendors, payment processors, property owners, service providers
Protected classification information	Marital status, age, household information, disability-related accommodation information, or other information you provide or that is required by law	Fair housing compliance, reasonable accommodations, application and tenancy administration	Service providers, property owners, legal/government parties
Commercial / tenancy information	Leasing history, unit information, services requested, payment history, resident account activity	Property management, lease administration, resident services, compliance	Entrata, property owners, service providers
Internet or electronic network activity	Browsing activity, portal activity, device data, cookie IDs, pages viewed	Website operation, analytics, security, user experience, marketing where permitted	Entrata, analytics providers, advertising/cookie providers
Geolocation	Approximate location from IP address	Security, analytics, website functionality	Entrata, analytics providers
Audio, electronic, or visual information	Emails, portal messages, call records if recorded, maintenance photos you submit	Communications, service requests, documentation, compliance	Entrata, service providers, property owners
Professional or employment information	Employer, income source, job history, references	Applicant screening and eligibility	Screening vendors, property owners, service providers
Sensitive personal information	SSN, driver’s license/state ID/passport number, account credentials, financial account information, precise information in documents you submit, screening information	Application processing, identity verification, screening, payments, legal compliance, security	Entrata, screening vendors, payment processors, service providers, legal/government parties

We do not use or disclose sensitive personal information to infer characteristics about you. We do not knowingly sell or share personal information of individuals under 18.

### **11. Children's Privacy**

The Services are intended for adults seeking or managing residential housing. We do not knowingly collect personal information from children under 13. If you believe a child has provided personal information to us without appropriate consent, please contact us.

### **12. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. Updates will be posted on the applicable property websites or otherwise made available through the Services. The "Last Updated" date will reflect the most recent revision.

### **13. Contact Us**

For questions about this Privacy Policy or to exercise privacy rights, contact:

**VennPoint Communities LLC**

2250 Progress Parkway

Schaumburg, IL 60173

**Email:** [info@vennpointre.com](mailto:info@vennpointre.com)