

RDDC Development Company, LLC

Privacy Policy

Effective Date: April 8, 2025

This River District Development Company, LLC (“RDDC”) Privacy Policy describes our collection of information during your interactions with our Services found at thedeltaelkhart.com for “The Delta” project (together, our “Services”), and the rights and choices you have regarding your information.

I. Information Collection

When operating our Services, RDDC may collect data, including Personal Information about you. The types of information we may collect depends on your level of engagement with the Services. “**Personal Information**” means information that can reasonably be linked to a particular individual or household.

Sources of Information Collection. We may collect Personal Information from a variety of sources, including directly from you and your interactions with our Services. We may also obtain information about you from other sources, including through third-party services.

The Personal Information we may collect includes:

Identifiers. We may collect identifiers when you voluntarily provide it to us. This includes:

- Name
- Phone number
- Email
- Any other identifiers or information you choose to provide us

II. Cookie Usage & Policy

We may use first party and third-party cookies on our Services. Different cookies are used to perform different functions, explained below. A visit to our Services could generate the following types of cookies:

- “**Strictly necessary**” cookies, which are first party cookies that must be set to allow us to deliver the Services and provide you with specific services.
- “**Performance**” cookies, which are first party cookies that help us collect information about how visitors use our Services and allow us to complete Services analysis and improvements. Performance cookies will remain on your computer after you close your browser.
- “**Functionality**” cookies, which allow our Services to remember your choices or preferences. These cookies enable you to move around our Services and use its features such as accessing secure areas (e.g. content for registered users) and allow us to offer you a personalized experience while using the Services.

- “**Analytics**” cookies, which allow us to see how you use our Services.
- “**Third Party**” cookies, which are deployed by third party partners.

Cookies stay on your device for different periods of time depending on the type of cookie that is placed. These include:

- **Session Cookies.** We use session cookies, which are temporary cookies that remain on your device until you leave our Services.
- **Persistent Cookies.** We also use persistent cookies, which remain on your device for a longer period of time to remember your preferences.

Information collected from cookies includes:

- IP address
- Browser type
- Browser settings
- Device ID
- Operating system
- Cookie ID
- Browsing history

Meta Pixel. We incorporate “pixels” provided by Meta Platforms, Inc. on our Services. This enables us to track user behavior after a user clicks on a Facebook ad and is redirected to our Services. By doing so, we can assess the effectiveness of Facebook ads for statistical and market research purposes and sometimes retarget certain users. Please note that the data collected through this process remains anonymous to us, meaning we do not have access to Personal Information of individual users. However, Facebook stores and processes this data. Therefore, we are providing you with this information based on our current understanding. It is important to be aware that Facebook may associate this information with your Facebook account and utilize it for its own promotional activities, in accordance with Facebook’s Data Usage Policy available [here](#). You have the option to authorize Facebook and its partners to display advertisements on and off Facebook (see [here](#)). Additionally, a cookie may be stored on your computer for these purposes.

GIF. We may use tiny images known as clear GIFs to track behavior of users, including statistics on who opens our emails.

IP Address. Our servers (or those of our service providers) automatically record certain log file information reported from your browser when you access the Services. These server logs may include information such as which pages of the Services you visited, your internet protocol (“IP”) address, browser type, and other information on how you interact with the Services. These log files are generally deleted periodically.

Google Analytics. We use, and/or some of our third-party service providers may use, Google Analytics or other analytics service to help us understand the use of our Services. Google Analytics is a web analysis service provided by Google. Google utilizes data it collects to track and examine the use of our Services and mobile app to prepare reports on its activities and share them with other

Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. The Personal Information collected and processed may include cookies, usage data, and other internet information.

Google Tag Manager. We use Google Tag Manager to gain insights from activities such as conversion events, file downloads, and page scroll depth.

III. Use of Personal Information

RDDC may use Personal Information for a variety of purposes, including to:

- **Manage our business and provide our Services.** RDDC may use Personal Information to facilitate usage of the Services.
- **Communicate.** RDDC may use Personal Information to communicate important business information, including delivering notices to you about the use of our Services.
- **Protect our business.** RDDC may use Personal Information to protect against fraud, unauthorized transactions, and other liabilities, and to secure our Services by identifying potential hackers and unauthorized users.
- **Ensure security and efficiency and to comply with the law.** We may use Personal Information for other purposes with your consent or where permitted by law, for example to comply with applicable legal requirements, court orders, legal proceedings, document requests, industry standards, and our internal policies.

IV. Disclosure of Personal Information

We may disclose your Personal Information in the following ways and circumstances:

- **When you consent.** RDDC will not disclose your Personal Information to others without your consent, except as specified in this Privacy Policy.
- **With our service providers and vendors.** We may transfer all or a portion of your Personal Information to our service providers who help us deliver our Services to you and for the purposes described in this Privacy Policy.
- **For a merger, acquisition, change in ownership, or reorganization.** Data and Personal Information we have collected may be disclosed to a third party in the event of a merger, transfer of ownership or assets, bankruptcy, or other corporate reorganization.
- **For data analytics.** We may share your Personal Information with analytics service providers such as Google.
- **When we are legally permitted or required to do so.** RDDC may disclose without your prior consent any Personal Information about you or your use of our services, if we believe disclosure is necessary or required by law. For example, we may disclose Personal Information to:
 - o Protect and defend the rights, property, or safety of RDDC, employees, other users of the Services, or the public;
 - o Respond to a legally valid request from a competent governmental authority;
 - o Respond to claims that any content violates the rights of third parties;
 - o Correspond with law enforcement agencies, if we are required to do so; and

- o Satisfy any applicable law, regulation, legal process, or governmental request.

V. Your Privacy Rights & Options

United States Rights. Certain states in the U.S., including California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights related to their Personal Information. Although some of these rights apply generally, certain rights will only apply to limited individuals or circumstances. To the extent that these laws apply, you may exercise the following rights:

- **Right to Know and Access Information.** Note that much of the information you are entitled to know or access is disclosed in this Privacy Policy. With this said, you have the right to know about our information practices. You also have the right to access the categories of data we collect, with whom we share or sell that information, and, in some cases, what specific Personal Information we associate with you or your account.
- **Right to Data Portability.** If you request a copy of your specific information then we will provide it in an easily accessible format.
- **Right to Deletion or Erasure.** You may request that we delete the information we have collected about you. Depending on the applicable law, in some cases we are required or permitted to retain your information, even if you validly requested we delete or erase it.
- **Right to Correct Information.** You may request we correct or rectify inaccurate information we have collected about you.
- **Right to Opt-out of Targeting Advertising, Sales, or Profiling.** You may opt-out of our use of your Personal Information for targeted advertising, sales, or profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of your privacy rights, contact us at the information provided within this Privacy Policy.

Appeal. If we deny your rights request, you have the right to request an appeal of our decision. To initiate an appeal, follow the instructions provided in the communication denying your request, or contact us at the contact information provided in this Notice.

Non-Discrimination. You have the right to not experience discrimination from us for exercising the rights listed in this section. What we mean by discrimination is denying you access to our Services or limiting the quality of our Services.

Email communications. You may control how you receive certain types of email communications by unsubscribing within the body of the communication. Note that some messages are required, service-related messages such as transaction confirmation messages, legal notices, or updates of which you may not opt-out.

Do Not Track Signals. DNT is a privacy preference you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. Because there is currently no industry or legal standard recognizing or honoring DNT signals, we do not recognize them.

VI. Third Party Services

This Privacy Policy applies only to our Services. Our Services may contain links to other Services including those that permit online transactions. We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other third parties we link to from our Services. RDDC does not endorse, approve, or certify these other Services, and we do not guarantee the accuracy, completeness, efficacy, or timeliness of the information contained on those Services. You should check the applicable privacy policy of the Services sponsor when linking to other Services.

Parts of our Services may link to Entrata, the leasing and marketing software we use to facilitate our Services. You can view their Privacy Policy and Terms and Conditions [here](#).

VII. Information Retention

RDDC uses several criteria to determine how long we should keep categories of Personal Information. We may retain your Personal Information for the time period reasonably necessary to achieve the business purposes outlined in this Privacy Policy to the extent permitted by applicable law.

Please understand that residual copies of the Personal Information can be stored in locations or formats that make complete erasure extremely difficult. The best way to ensure you control your information is to give us only the Personal Information that you are completely comfortable sharing with us.

VIII. Security

RDDC takes reasonable steps to secure your Personal Information. We maintain physical, electronic, and procedural safeguards to ensure that any Personal Information maintained is stored and processed responsibly. However, no internet transmission is ever fully secure, and we cannot guarantee that information transmitted via our Services will remain confidential at all times.

IX. Changes to Privacy Policy

We may update or change this Privacy Policy from time to time. We will post the changes on our Services and will indicate the effective date. Your continued use of services after the changes are effective constitutes your acceptance of the Privacy Policy.

X. Contact Us

If you have any questions about this Privacy Policy, contact us at:

Meggan Fink, Marketing & Community Partner
meggan@weimpactgroup.com