PRIVACY POLICY

Hanken Cono Assad & Co., Inc.

Effective Date: August 28, 2026

Last Updated: August 28, 2026

1. Introduction

This Privacy Policy describes how Hanken Cono Assad & Co., Inc. ("we," "us," or "our") collects, uses, discloses, and otherwise processes personal information in connection with our websites, mobile applications, text messaging and chatbot services, email communications, and the leasing, management, and operation of our residential apartment communities (collectively, the "Services"). This Privacy Policy applies to prospective residents, current residents, former residents, website visitors, and other individuals who interact with us through the Services.

2. Information We Collect

We collect the following categories of personal information:

A. Identifiers and Contact Information. Name, email address, phone number, mailing address, date of birth, and government-issued identification numbers (such as Social Security number, driver's license number, or passport number).

B. Financial and Payment Information. Bank account numbers, credit or debit card numbers, income and employment verification records, credit history and credit scores, and payment history.

C. Background Screening Information. Eviction history, rental verification and history, and credit reports obtained in connection with lease applications, subject to applicable law, including the Fair Credit Reporting Act.

D. Lease and Tenancy Information. Lease terms, unit number, move-in and move-out dates, rent payment records, maintenance request details, and other information related to your tenancy.

E. Communications Data. Transcripts and records of communications with us, including chatbot conversations, text messages, emails, and telephone call records. Where permitted by applicable law, telephone calls may be monitored or recorded for quality assurance, training, security, compliance, and recordkeeping purposes.

F. Device and Online Activity Information. IP address, browser type and version, device identifiers, operating system, referring URLs, pages visited on our website, clickstream data, cookies, and similar tracking technologies.

G. Smart Home and IoT Device Data. Data generated by smart home devices installed in our communities, including smart lock access logs, thermostat usage, and connected device activity.

H. Inferences. Inferences drawn from the categories above to create a profile reflecting your preferences, characteristics, or behavior.

I. Sensitive Personal Information. Certain information we collect may be classified as sensitive under applicable state law, including Social Security number, government-issued identification numbers, financial account information with credentials, background screening and credit check data, and precise geolocation data (if collected through smart home or IoT devices). We will provide notice and, where required by applicable law, obtain your consent or provide an opportunity to opt out before processing sensitive personal information.

3. Sources of Personal Information

We collect personal information from the following sources:

- **Directly from you**, when you submit a lease application, sign a lease, make a payment, submit a maintenance request, communicate with us via chat, text, email, or phone, or otherwise interact with us.
- **From third-party service providers**, including consumer reporting agencies (for background and credit checks), payment processors, and identity verification services.
- **Automatically**, through cookies, pixels, and similar tracking technologies when you visit our website or interact with our online Services.
- **From our technology platform providers**, which operate our property management platform, chatbot, and text messaging services on our behalf.

4. How We Use Your Information

We use personal information for the following purposes:

- **Leasing operations:** Evaluating lease applications, conducting background and credit checks, executing and managing leases, and processing move-ins and move-outs.
- **Rent collection and financial management:** Processing rent payments, managing accounts receivable, and enforcing payment obligations.
- **Maintenance and property operations:** Responding to and tracking maintenance requests, managing smart home devices, and operating building systems.
- **Communications:** Responding to inquiries, sending transactional communications related to your lease, delivering service notifications, and communicating through chatbot, text, and email.
- **Marketing and advertising:** Sending promotional communications (where permitted and where you have opted in), operating targeted advertising campaigns, and analyzing the effectiveness of marketing efforts.
- **Compliance and legal obligations:** Complying with applicable laws, regulations, and legal processes, including fair housing laws, FCRA requirements, and billing disclosure requirements.
- **Safety and security:** Protecting the safety and security of our communities, residents, staff, and property, including through access control systems and security monitoring.
- **Business operations:** Conducting internal analytics, improving our Services, and managing vendor relationships.
- **Application review and screening:** Reviewing rental applications and supporting tenant screening processes. We do not make housing eligibility decisions solely through automated decision-making technologies without appropriate human review.

- **Fair housing compliance:** Administering our leasing and property management operations in compliance with applicable federal, state, and local fair housing and anti-discrimination laws.

5. Legal Bases and Grounds for Processing

We process personal information for the following reasons:

- To perform obligations related to lease applications, leases, and resident services.
- To fulfill contractual commitments and provide requested Services.
- To comply with legal and regulatory requirements.
- To protect the safety, security, rights, and property of our residents, employees, communities, and business operations.
- To pursue legitimate business interests, including improving Services, preventing fraud, and maintaining operational efficiency.
- To obtain and act upon consent where required by applicable law.

6. How We Share Your Information

We share personal information with the following categories of third parties:

Category of Third Party	**Types of Data Shared**	**Purpose**
Background screening providers	Identifiers, SSN, application information	Tenant screening and credit checks (subject to FCRA)
Payment processors	Financial and payment information	Rent collection and payment processing
Maintenance vendors	Name, contact information, unit number, maintenance request details	Fulfilling maintenance and repair requests
Insurance providers	Identifiers, lease information	Renters insurance verification and claims
Smart lock and IoT providers	Identifiers, access credentials, device data	Smart home device provisioning and management
Technology platform providers	All categories as necessary	Property management platform operations, chatbot, text messaging
Advertising networks	Device identifiers, online activity, cookies	Targeted and behavioral advertising
Analytics providers	Device and online activity information	Website analytics and performance measurement
Law enforcement and government entities	As required by law	Compliance with legal obligations, subpoenas, and court orders
Professional advisors	As necessary	Legal, accounting, and consulting services

Service Provider Requirements. We require service providers and contractors that process personal information on our behalf to maintain appropriate safeguards for such information and to use it only for the purposes authorized by us and permitted by applicable law.

Sale and Sharing of Personal Information. We may share personal information with advertising networks through the use of cookies, pixels, and similar tracking technologies on our website. Under certain state laws, this activity may constitute a "sale" of personal information or "sharing" for targeted advertising purposes. You have the right to opt out of such sale or sharing as described in Section 9 below. Where required by applicable law, we provide a "Do Not Sell or Share My Personal Information" link or equivalent mechanism on our website and honor eligible opt-out preference signals, including the Global Privacy Control (GPC).

7. Text Messaging, Chatbot, and Email Communications

By providing your phone number and consenting to receive text messages, you agree to receive transactional and, where you have separately opted in, promotional text messages from Hanken Cono Assad & Co., Inc. or our service providers, including through automated means.

Opt-in consent for text messaging is voluntary. You are not required to consent to text messaging as a condition of purchasing any property, goods, or services, or entering into a lease.

Opt-out. You may opt out of promotional text messages at any time by replying STOP to any message. Opting out of promotional messages will not affect transactional messages related to your lease. For help, reply HELP or contact us at (619) 698-4770 or info@hcares.com.

Message frequency. Message frequency varies.

Message and data rates may apply depending on your mobile phone service plan.

Carriers are not liable for any delayed or undelivered messages.

No mobile phone number, SMS consent, or text messaging opt-in data will be shared with third parties or affiliates for their own marketing or promotional purposes. Mobile phone numbers and SMS consent information may be shared with service providers solely as necessary to provide and support text messaging services on our behalf.

Our chatbot is operated by Entrata on our behalf. Communications through the chatbot are collected and processed in accordance with this Privacy Policy.

Automated Technologies. Certain communications tools, including our chatbot services, may utilize automated technologies to assist with responding to inquiries and routing requests. Chatbot interactions may be reviewed by our personnel and service providers to improve service quality and operational efficiency. Individuals should avoid submitting highly sensitive information through chatbot services unless specifically requested to do so.

Standard message and data rates may apply.

8. Cookies and Tracking Technologies

Our website uses cookies, web beacons, pixels, and similar tracking technologies to collect information about your browsing activity. These technologies serve the following purposes:

- **Strictly necessary cookies:** Required for the website to function (e.g., session management, security).
- **Analytics cookies:** Help us understand how visitors interact with our website.
- **Advertising cookies:** Used to deliver targeted advertisements and measure advertising effectiveness.

You may manage your cookie preferences through your browser settings or through our cookie preference tool on our website. Disabling certain cookies may affect your ability to use some features of our website.

9. Your Privacy Rights

Depending on the state in which you reside, you may have some or all of the following rights regarding your personal information:

- **Right to know and access:** Confirm whether we are processing your personal information and request access to that information.
- **Right to correct:** Request correction of inaccurate personal information.
- **Right to delete:** Request deletion of your personal information.
- **Right to portability:** Obtain a copy of your personal information in a portable and readily usable format.
- **Right to opt out of sale:** Opt out of the sale of your personal information to third parties.
- **Right to opt out of targeted advertising:** Opt out of the processing of your personal information for targeted advertising.
- **Right to opt out of profiling:** Opt out of profiling in furtherance of decisions that produce legal or similarly significant effects.
- **Right to limit use of sensitive personal information:** Where applicable, limit our use and disclosure of your sensitive personal information to purposes that are necessary to perform the Services.
- **Right to non-discrimination:** We will not discriminate against you for exercising your privacy rights.

Global Privacy Control. Where required by applicable law, we recognize and process browser-based opt-out preference signals, including the Global Privacy Control (GPC), as requests to opt out of the sale or sharing of personal information and targeted advertising.

How to exercise your rights. You may submit a request by contacting us at:

- **Email:** info@hcares.com
- **Mail:** 5550 Baltimore Drive, 2nd Floor, La Mesa, CA 91942
- **Phone:** (619) 698-4770

You may also designate an authorized agent to submit a request on your behalf, subject to our verification procedures.

Verification. We will verify your identity before processing your request. We may ask you to provide information that matches what we have on file.

Response time. We will respond to your request within the timeframe required by applicable law (generally 45 days, with the possibility of an extension).

Appeal. If we deny your request, you may appeal by contacting us at info@hcares.com. We will respond to your appeal within the timeframe required by applicable law. If your appeal is denied, you may contact your state's attorney general or applicable regulatory authority.

10. Data Security

We maintain reasonable administrative, technical, and physical safeguards designed to protect the confidentiality and integrity of personal information against unauthorized access, use, disclosure, alteration, or destruction. These measures include encryption of sensitive data in transit and at rest, access controls, employee training, and periodic security assessments. No system is completely secure, and we cannot guarantee the absolute security of your personal information. In the event of a data breach, security incident, or unauthorized access involving personal information, we will provide notification to affected individuals and regulatory authorities as required by applicable law.

Data Processing Locations. Personal information may be stored, processed, and maintained in the United States and in other jurisdictions where our service providers operate. We take appropriate measures designed to protect personal information when it is transferred or processed.

11. Children's Privacy

We do not knowingly collect personal information from individuals under 16 years of age. We do not knowingly sell or share for targeted advertising purposes the personal information of individuals under 18 years of age. If we become aware that we have collected personal information from a child in violation of applicable law, we will take reasonable steps to delete such information.

12. Third-Party Links

Our website and communications may contain links to third-party websites or services. We are not responsible for the privacy practices of those third parties. We encourage you to review the privacy policies of any third-party websites you visit.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we make material changes, we will notify you by posting the updated policy on our website with a revised "Last Updated" date. Where required by applicable law, we will provide you with reasonable notice and an opportunity to withdraw consent before material changes take effect. We encourage you to review this Privacy Policy periodically.

14. Contact Us

If you have questions about this Privacy Policy or wish to exercise your privacy rights, please contact us at:

Hanken Cono Assad & Co., Inc.

5550 Baltimore Drive, 2nd Floor,
La Mesa, CA 91942
(619) 698-4770
info@hcares.com

15. State-Specific Supplements

The following supplements apply to residents of the identified states and are intended to be read together with the Privacy Policy above. To the extent any provision in a state supplement conflicts with the general Privacy Policy, the state supplement controls for residents of that state.

15.1 California Residents

This section applies to California residents and supplements the Privacy Policy above pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (Cal. Civ. Code § 1798.100 et seq.).

Categories of personal information collected in the preceding 12 months: All categories identified in Section 2 above.

Sources of personal information: All sources identified in Section 3 above.

Business or commercial purposes for collection: All purposes identified in Section 4 above.

Categories of personal information sold or shared for cross-context behavioral advertising in the preceding 12 months: Device identifiers and online activity information shared with advertising networks.

Categories of personal information disclosed for a business purpose in the preceding 12 months: All categories identified in Section 2, disclosed to the third parties identified in Section 6.

Retention: We retain personal information for as long as reasonably necessary to fulfill the purposes described in this Privacy Policy, comply with our legal obligations, resolve disputes, and enforce our agreements. Specific retention periods include:

- **Lease application data** for applicants who do not become residents: Up to 4 years from the date of application.
- **Resident data:** Duration of the lease plus up to 7 years following lease termination.
- **Communications records** (text messages, chatbot transcripts, emails): Up to 7 years.
- **Website activity data** (cookies, analytics): 12 months.
- **Background screening reports:** Up to 7 years, subject to FCRA requirements.

Sensitive personal information: We collect Social Security numbers, government-issued identification numbers, financial account information with credentials, and background screening data. Where required by applicable law, California residents may request that we limit certain uses and disclosures of sensitive personal information that are not necessary to perform requested Services or otherwise permitted by law.

Right to limit use of sensitive personal information: California residents may exercise any applicable right to limit certain uses and disclosures of sensitive personal information by contacting us using the methods described in Section 9.

Do Not Sell or Share My Personal Information: California residents may opt out of the sale or sharing of personal information by using the "Do Not Sell or Share My Personal Information" link or equivalent mechanism available on our website, by enabling a recognized Global Privacy Control signal, or by contacting us using the methods identified in Section 9.

Financial incentive programs: We do not offer financial incentive programs related to the collection of personal information.

15.2 Minnesota Residents

This section applies to Minnesota residents pursuant to Minn. Stat. § 325M et seq.

Privacy Officer: info@hcares.com, (619) 698-4770

Data retention: Our data retention practices are described in the Retention subsection of Section 15.1 above.

Homepage link: This Privacy Policy is accessible via a conspicuous hyperlink using the word "privacy" on our website homepage.

Material changes: We will provide Minnesota residents with notice of material changes to this Privacy Policy and a reasonable opportunity to withdraw consent before such changes take effect.

Universal opt-out mechanism: We honor universal opt-out mechanisms, including the Global Privacy Control, for Minnesota residents.

15.3 Maryland Residents

This section applies to Maryland residents pursuant to Md. Code, Com. Law § 14-4601 et seq.

Sensitive data: We process sensitive personal information only when strictly necessary to provide the Services you have requested. We do not sell sensitive personal information of Maryland residents. We do not sell the personal information of consumers we know to be under 18 years of age.

Geofencing: We do not use geofencing technology within 1,750 feet of any mental health facility or reproductive health facility to collect data, send notifications, or identify or target individuals seeking health care services.

15.4 Colorado Residents

This section applies to Colorado residents pursuant to Colo. Rev. Stat. § 6-1-1301 et seq.

Universal opt-out mechanism: We honor universal opt-out mechanisms, including the Global Privacy Control, for Colorado residents.

Consent for sensitive data: We will obtain your consent before processing sensitive personal information, including data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life or sexual orientation, citizenship or immigration status, genetic or biometric data, personal information of a known child, or precise geolocation data.

15.5 Oregon Residents

This section applies to Oregon residents pursuant to Or. Rev. Stat. § 646A.570 et seq.

Universal opt-out mechanism: We honor universal opt-out mechanisms, including the Global Privacy Control, for Oregon residents.

Geolocation data: We do not sell geolocation data that is accurate within 1,750 feet. We do not sell the personal information of consumers we know to be under 16 years of age.

15.6 Connecticut Residents

This section applies to Connecticut residents pursuant to Conn. Gen. Stat. § 42-515 et seq.

Universal opt-out mechanism: We honor universal opt-out mechanisms, including the Global Privacy Control, for Connecticut residents.

Consent for sensitive data: We will obtain your consent before processing sensitive personal information.

15.7 Virginia, Texas, Delaware, Montana, New Hampshire, New Jersey, Nebraska, Iowa, Tennessee, Indiana, Kentucky, Rhode Island, Utah, and Florida Residents

Residents of these states have the rights described in Section 9 above, subject to the specific scope and limitations of each state's law. Consumer rights, exemptions, and response timelines may vary by state. If you are a resident of one of these states and wish to exercise your privacy rights, please contact us using the methods described in Section 9. If you have questions about which rights apply to you, please contact our Privacy Officer at info@hcares.com

Sensitive data processing: In states that require consent or an opt-out opportunity before processing sensitive personal information, we will provide the required notice and opportunity before such processing occurs.

Cure periods: Where applicable state law provides a cure period for alleged violations, we will comply with such requirements.