

Phillips Management Group Privacy Policy

Effective: 09/19/2026

Last Revision: 09/19/2026

Phillips Management Group, the property owners and communities we manage, and our third-party administrator where applicable (collectively, “PMG,” “we,” “us,” or “our”) respect your privacy. This Privacy Policy explains how PMG collects, uses, discloses, retains, and protects personal information in connection with our leasing, property-management, resident-service, communications, recruiting, workforce, vendor, and business operations.

1. Scope and relationship to the RentVision website policy

This Privacy Policy applies to personal information PMG and/or its third-party administrator handles through rental inquiries and applications, leasing and resident services, property operations, payment and account administration, customer support, email and text communications, chat or virtual-assistant services, recruiting and employment, vendor and business relationships, events, surveys, and technology platforms used in those activities. PMG may provide additional notices for specific interactions, including employment or legally regulated processes; those notices supplement this policy.

Our public website is operated on our behalf by RentVision, LLC. RentVision’s separate Website Privacy Policy describes information collected through the website and RentVision’s website technologies, including cookies, analytics, advertising, and remarketing. That policy remains available on the website. This PMG Privacy Policy applies when PMG receives or otherwise processes information originating from the website and to PMG’s broader business operations outside the website.

This Privacy Policy does not apply to websites, applications, or services operated independently by third parties. Those third parties’ privacy notices govern their own practices.

2. Personal information we may collect

Depending on your relationship with PMG and the services you use, we may collect the following categories of personal information:

Category	Examples
Identifiers and contact information	Name, mailing address, email address, telephone number, date of birth, account or resident identifiers, government-issued identification, and similar identifiers.
Application and leasing information	Rental preferences, application details, household and occupant information, rental history, references, income and employment information, screening results, lease records, and move-in or move-out information.
Financial and transaction information	Payment and billing information, ledger activity, bank or payment-card details handled through payment providers, deposits, balances, and transaction history.
Resident and property-service information	Maintenance requests, access or entry records, parking and vehicle information, package information, pet information, amenity use, communications, complaints, and accommodation-related records where applicable.
Communications and interactions	Emails, texts, chat messages, call details or recordings where notice or consent is provided, survey responses, and other correspondence.
Employment and business information	Resumes, work history, professional credentials, background or reference information where permitted, vendor contacts, business communications, tax or payment details, and workforce records.
Device and online information	IP address, device identifiers, browser or app information, log data, portal activity, and similar technical information collected through PMG-operated platforms or received from service providers.
Audio, visual, and security information	Photos, video or access-control records, security-camera footage, and recorded communications where applicable.
Inferences and preferences	Housing preferences, communication preferences, and inferences used to provide or improve services.

Category	Examples
Sensitive personal information	Government identifiers, account credentials, precise location or access information, financial information, and other information treated as sensitive under applicable law. PMG collects sensitive information only when reasonably necessary for a permitted business purpose.

We may also collect other information that you voluntarily provide or that we describe at the time of collection.

3. Sources of personal information

We may collect personal information:

- Directly from you, including through applications, leases, forms, portals, emails, texts, calls, surveys, and in-person interactions.
- From occupants, guarantors, references, employers, prior housing providers, emergency contacts, or other people involved in your application or tenancy.
- From service providers and business partners, such as RentVision, Entrata and related integration providers, screening providers, payment processors, communications providers, utility or insurance providers, and property vendors.
- Automatically through PMG-operated portals, applications, devices, access systems, and communications technology.
- From public records, governmental entities, law enforcement, credit or consumer-reporting agencies, and other lawful sources.

4. How we use personal information

We may use personal information to:

- Respond to inquiries, provide availability and pricing information, schedule tours, and communicate with prospects.
- Process rental applications, verify information, conduct legally permitted screening, and make leasing decisions.
- Prepare, administer, renew, and enforce leases and other agreements.
- Manage resident accounts, payments, deposits, balances, notices, and collections.
- Provide maintenance, resident support, amenities, access, parking, package, safety, and other property services.
- Send service, transactional, operational, marketing, survey, and event communications, subject to applicable consent and opt-out requirements.
- Operate, maintain, secure, troubleshoot, and improve our systems, services, and business operations.
- Prevent and investigate fraud, misuse, safety issues, policy violations, and security incidents.
- Comply with law, respond to lawful requests, protect rights and safety, establish or defend legal claims, and enforce agreements.
- Conduct analytics, planning, quality assurance, training, and research using personal information or aggregated/deidentified information.
- Complete a merger, acquisition, financing, sale, transfer, or other business transaction.
- Recruit, hire, support, compensate, train, manage, and communicate with employees and applicants; administer benefits and workforce obligations; and manage vendors and other business relationships.

5. How we disclose personal information

- We may disclose personal information to the following categories of recipients when reasonably necessary for the purposes described above:
- Property owners, affiliated entities, employees, and authorized representatives involved in managing a community or providing services.
- Service providers and contractors, including property-management and leasing platforms, screening providers, payment processors, communications vendors, maintenance vendors, utilities, insurers, security providers, analytics providers, professional advisers, and other operational vendors.
- Government agencies, courts, law enforcement, regulators, and other parties when required or permitted by law.
- Parties involved in a business transaction or due diligence process, subject to appropriate safeguards.
- Other parties at your direction, with your consent, or as disclosed when information is collected.
- PMG may use de-identified or aggregated information for lawful purposes and may disclose it where it cannot reasonably be linked to an individual.

6. Sale, sharing, and targeted advertising

PMG does not sell personal information in exchange for money. Some privacy laws define “sale” or “sharing” more broadly and may treat certain disclosures for targeted advertising or analytics as a sale or sharing even when no money changes hands. RentVision’s Website Privacy Policy describes advertising and tracking technologies used on the RentVision-operated website.

Where applicable law gives you a right to opt out of PMG's sale, sharing, or use of personal information for targeted advertising, you may submit a request using the methods in Section 12. PMG will process the request as required by applicable law.

7. Automated processing and profiling

PMG may use technology to help organize inquiries, route communications, identify available homes, support application processing, prevent fraud, and improve services. PMG does not intend to rely solely on automated processing to make a decision that produces legal or similarly significant effects unless permitted by law and appropriate notice and rights are provided.

8. Data retention

PMG retains personal information only for as long as reasonably necessary for the purpose for which it was collected, including to provide services, administer a lease or account, comply with legal and regulatory obligations, resolve disputes, prevent fraud, enforce agreements, and establish or defend legal claims. Retention periods vary based on the type of record, the relationship involved, legal requirements, and operational needs. When information is no longer reasonably necessary, PMG may delete, destroy, anonymize, or deidentify it in accordance with its record-retention practices.

9. Security

PMG uses reasonable administrative, technical, and physical safeguards designed to protect personal information from unauthorized access, use, alteration, or disclosure. These measures may include access controls, vendor-management practices, workforce procedures, and security features supplied by the systems PMG uses. No method of transmission or storage is completely secure, and PMG cannot guarantee absolute security.

10. Children's information

PMG's services are not directed to children under 16, and PMG does not knowingly collect personal information directly from children under 16 for marketing purposes. PMG may receive information about children from a parent, guardian, applicant, or resident when reasonably necessary for rental applications, occupancy records, accommodation requests, emergency contacts, or property-management services. PMG does not knowingly sell or share the personal information of children under 16 for cross-context behavioral advertising.

11. Your privacy choices and rights

Depending on where you live and whether a particular law applies to PMG or the information involved, you may have the right to:

- Confirm whether PMG processes your personal information and request access to certain information.
- Request correction of inaccurate personal information.
- Request deletion of certain personal information.
- Request a portable copy of certain personal information.
- Opt out of certain sales, sharing, targeted advertising, or qualifying profiling.
- Limit certain uses or disclosures of sensitive personal information where required by law.
- Appeal PMG's decision on a privacy request where applicable.
- Receive equal service and not be unlawfully discriminated against for exercising a privacy right.

These rights are subject to legal limitations and exceptions. For example, PMG may need to retain information to complete a transaction, administer a lease, maintain required records, protect safety or security, comply with law, or establish or defend legal claims.

PMG will verify requests as required by law. We may ask for information that reasonably matches our records and is appropriate to the sensitivity of the request. An authorized agent may submit a request where permitted by law, but PMG may require proof of authorization and direct verification with the consumer.

12. How to submit a privacy request

To ask a privacy question or submit a request, contact:

Privacy Contact: Phillips Management Group

Email: privacy@phillipsmanagement.com

Phone: 336.274.2481

Mail: 1400 Battleground Avenue, Suite 201, Greensboro, NC 27408

Please describe the request and provide enough information for PMG to identify the relevant records. Do not send Social Security numbers, bank-account numbers, passwords, or copies of identification by ordinary email unless PMG specifically provides a secure method.

13. Communications preferences

You may unsubscribe from marketing emails by using the unsubscribe link in the message. You may opt out of marketing text messages by replying STOP or following the instructions in the message. Even if you opt out of marketing, PMG may still send non-marketing

messages concerning an inquiry, application, lease, account, payment, maintenance request, safety matter, or other service-related issue.

14. Third-party services and links

PMG uses third-party platforms and service providers to support its operations. Their privacy practices may apply when you interact directly with their services. PMG encourages you to review the privacy notices presented by those providers. PMG is not responsible for the privacy practices of independently operated third-party websites or services.

15. Changes to this Privacy Policy

PMG may update this Privacy Policy from time to time. The “Last Revision” date at the beginning of the policy will show when the policy was most recently revised. If required by law, PMG will provide additional notice or obtain consent for material changes.

California Privacy Supplement

This California Privacy Supplement applies only to California residents and only to the extent the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, “CCPA”), applies to PMG and the personal information involved. It supplements the main Privacy Policy. Terms defined by the CCPA have the same meaning in this supplement.

A. Notice at collection

During the preceding 12 months, PMG may have collected the categories listed below. PMG may collect and use these categories for the business and commercial purposes described in Sections 3 and 4 of the main Privacy Policy and may disclose them to the recipient categories described in Section 5.

CCPA category	PMG examples and status
Identifiers	Name, contact details, account or resident identifiers, government identifiers, online identifiers. Collected as needed for leasing and operations.
Customer records	Signature, address, telephone number, insurance, employment, financial, and similar application or account information.
Protected classifications	Age, familial status, disability/accommodation information, and other information handled as required or permitted by fair-housing and other laws.
Commercial information	Rental history, transactions, payments, account activity, service history, and preferences.
Internet or electronic activity	Portal, app, communications, device, and log information. Website activity is also addressed by RentVision’s Website Privacy Policy.
Geolocation data	General location inferred from an IP address and, where used, property or device access/location information.
Audio, electronic, visual, or similar information	Call recordings where notice/consent is provided, messages, photographs, security footage, and access records.
Professional or employment-related information	Employment and income information used for application qualification or verification.
Inferences	Housing and communication preferences and inferences used to provide services.
Sensitive personal information	Government identifiers, financial information, account credentials, precise location/access information, and accommodation-related information, where applicable.

PMG does not collect every example listed above from every person. Actual collection depends on the person’s relationship with PMG and the services used.

B. Sources, purposes, and disclosures

PMG obtains California personal information from the sources described in Section 3, uses it for the purposes described in Section 4, and may disclose it to the recipient categories described in Section 5. PMG retains it as described in Section 8.

C. Sale and sharing

PMG does not sell personal information in exchange for money. Under the CCPA's broad definitions, certain disclosures for cross-context behavioral advertising may be considered "sharing," and certain other disclosures may be considered a "sale." RentVision's Website Privacy Policy describes advertising and remarketing technologies on the RentVision-operated website. California residents may submit an opt-out request to PMG using Section 12 for personal information controlled by PMG.

PMG does not knowingly sell or share the personal information of consumers under 16 years of age.

D. Use and disclosure of sensitive personal information

PMG uses and discloses sensitive personal information only for purposes reasonably necessary to provide requested housing and property-management services; process applications and payments; verify identity; maintain safety, security, and integrity; comply with law; and perform other purposes permitted without a right to limit under the CCPA. If PMG begins using sensitive personal information for additional purposes that trigger a right to limit, PMG will provide the notice and choice required by law.

E. California privacy rights

Subject to applicable exceptions and verification requirements, California residents may have the right to request:

The categories and specific pieces of personal information PMG has collected about them.

The categories of sources, purposes, and third parties associated with that information.

Correction of inaccurate personal information.

Deletion of personal information.

Opt-out of sale or sharing of personal information.

Limitation of certain uses and disclosures of sensitive personal information, where applicable.

Information about, and the ability to opt out of, certain qualifying automated decision-making technology if and when required by applicable regulations.

Non-discriminatory treatment for exercising CCPA rights.

California residents may submit requests using Section 12. PMG will respond within the time and in the manner required by applicable law. PMG may deny or limit a request where an exception applies and will explain the basis for its response as required.

F. Authorized agents

A California resident may authorize an agent to submit a request. PMG may require the agent to provide signed authorization and may contact the resident directly to verify identity or confirm permission, unless the agent has a valid power of attorney under applicable law.

G. California metrics and other disclosures

If PMG becomes legally required to publish consumer-request metrics or other California-specific disclosures, PMG will make those disclosures available in the form and at the time required by law.