

## **PRIVACY POLICY**

Effective Date: October 16, 2023

This Privacy and Cookies Statement (“Privacy Statement”) describes how Article Student Living and its related companies (collectively, the “Firm”) collects, uses, shares, and otherwise processes individually identifiable information about visitors to our websites, including without limitations website visitors who are prospective or actual residents of our facilities, job applicants, investors, as well as contact persons of our corporate customers, business partners, vendors, and suppliers (“Personal Data”). This Privacy Statement applies to Personal Data that we collect through our Internet websites.

### **Summary of Key Points**

- **Collection:** We collect name, contact details, and other Personal Data related to our commercial, employment, and residential relationships.
- **Use:** We use Personal Data to operate and improve our websites, perform transactions, register residents, authenticate registered users to secure areas of our websites, assess job and resident applicants, respond to inquiries, manage accounts and maintain business operations, provide relevant marketing, and to fulfil other business and compliance purposes.
- **Third-Party Providers:** We transfer Personal Data to our third-party providers of services as necessary to operate and improve our websites, perform transactions, register residents, respond to requests, and to fulfil other business and compliance purposes.
- **Marketing choices:** You have control over how we use Personal Data for direct marketing.
- **Cookies:** We use cookies on our website, and provide choices on use of cookies, including third party targeting and advertising.
- **Data subject rights:** You have certain rights to request access, rectification, deletion, that we stop selling or sharing your Personal Data, that we do not use your Personal Data for targeted advertising, or other actions regarding your Personal Data where required by applicable law.
- **Information security:** We maintain reasonable technical and organizational measures to protect Personal Data from loss, misuse, alteration, or unintentional destruction.

- **Geography / Target Markets:** We are a company located and operating solely within the United States of America. All of our business, properties, and operations are located within the United States of America and the websites are not targeted to, and we do not market our properties, to residents outside of the United States of America. Other issues: We provide other information in this Privacy Statement about: (i) the legal basis for collecting and processing Personal Data, (ii) the consequences for not providing Personal Data, (iii) automated decision-making, (iv) do-not-track (DNT) signals, (v) data retention, (vi) links to third party websites, and (vii) changes to this Privacy Statement.
- **Contact us:** Please contact us as detailed below with any questions.

#### 1. Collection of Personal Data. We collect the following categories of Personal Data:

- **Basic Information:** Name, title, company, region, job responsibilities, phone number, mailing address, email address, contact details, and any other Personal Data that you submit to us during the course of correspondence with us.
- **Resident Application/Registration Information:** Data provided by resident applicants in connection with residential opportunities (e.g., name, date of birth, email address, contact information, guarantor information, bank information, income, debt, criminal history, employer information).
- **Registration Information:** Newsletter and/or other alert requests, subscriptions, and downloads.
- **Marketing Information:** Data about individual participation in product interests, query information, and preferences.
- **Job Applicant Information:** Data provided by job applicants or others on our websites or offline means in connection with employment opportunities (e.g., name, resume, education history, employment history, certifications, salary requirements, contact details, work status authorization and references).
- **Compliance Information:** Government identifiers and other compliance and due diligence data, to the extent required and permitted by applicable law.
- **Transaction Information:** Transaction history, and performance data.
- **Device Information:** Computer Internet Protocol (IP) address, unique device identifier (UDID), cookies and other data linked to a device, and data about usage of our website (Usage Information). Note, however, we do not consider Device

Information to be Personal Data except where we link it to you as an individual or where applicable law provides otherwise.

2. Use of Personal Data. We use the above categories of Personal Data for the following purposes:

- a. Purpose of Use: Perform transactions and respond to your inquiries.
  - Categories of Personal Data Used: Basic Information, Registration Information, Transaction Information, and Device Information.
- b. Purpose of Use: Assess and register potential and current residents.
  - Categories of Personal Data Used: Basic Information, Resident Application/Registration Information.
- c. Purpose of Use: Manage your accounts and maintain our business operations.
  - Categories of Personal Data Used: Basic Information, Registration Information, Resident Application/Registration Information, Transaction Information, and Device Information.
- d. Purpose of Use: Make our website more intuitive and easy to use and conduct research regarding opinion of customer services.
  - Categories of Personal Data Used: Device Information, Basic Information, Registration Information.
- e. Purpose of Use: Protect the security and effective functioning of our website and information technology systems.
  - Categories of Personal Data Used: Basic Information, Registration Information, Transaction Information, and Device Information.
- f. Purpose of Use: Provide relevant marketing.
  - Categories of Personal Data Used: Basic Information, Registration Information, Resident Application/Registration Information, Device Information, Transaction Information, and Marketing Information.
- g. Purpose of Use: Address our compliance and legal obligations and exercise our legal rights.

- Categories of Personal Data Used: Basic Information, Registration Information, Compliance Information, Transaction Information, and Device Information.
- h. Purpose of Use: Consider individuals for employment and contractor opportunities and manage on-boarding procedures.
  - Categories of Personal Data Used: Job Applicant Information.

3. Transfers of Personal Data. We may transfer Personal Data with the following categories of recipients:

- The Firm: We exchange Personal Data within the Article Student Living and its group of affiliates and subsidiaries, as necessary for the purposes identified above.
- Suppliers and service providers: We exchange Personal Data with suppliers and service providers, acting as data processors and/or service providers, to enable such parties to perform functions on our behalf and under our instructions in order to carry out the purposes identified above (e.g., information technology services, human resources and resident management services, statistical analysis). We require such parties by contract to provide reasonable security for Personal Data and to use and process such Personal Data only on our behalf. A limited number of service providers will act as businesses in their own right and/or data controllers and will be contractually obligated to comply with applicable data protection laws, rules, and regulations.
  - Auditors, advisors, business partners, and financial institutions: We exchange Personal Data with auditors for the performance of audit functions, and with advisors for the provision of legal and other advice, with business partners to operate our business, and with financial institutions in connection with payment and other transactions.
- Business reorganization: In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Data may be among the assets transferred. The acquirer of your Personal Data will inform you in accordance with and where mandated by applicable law. You acknowledge that such transfers may occur and are permitted by this Privacy Statement, and that any acquirer of our assets may continue to process your Personal Data as set forth in this Privacy Statement.

- **Mandatory disclosures and legal rights:** Where mandated or permitted by applicable law, regulation or legal process, we will share Personal Data in order to comply with any subpoena, court order or other legal process, or other governmental request. We also share Personal Data to establish or protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims or prevent fraud.

If you have questions about the parties with whom we share Personal Data, please contact us as specified below and we will provide information as legally permitted.

**4. Marketing Choices.** To the extent that we provide you with direct marketing communications, you have control regarding our use of your Personal Data for such reasons. If you no longer wish to receive any direct marketing communications, you can opt-out at any time. To do so, use the unsubscribe link within a marketing email received from us, or exercise your data protection rights as set forth below.

**5. Cookies.** We use and allow certain third parties to use cookies, web beacons, and similar tracking technologies (collectively, “cookies”) on our website.

*What are cookies?*

Cookies are small amounts of data that are stored on your browser, device, or the page you are viewing. Some cookies are deleted once you close your browser, while other cookies are retained even after you close your browser so that you can be recognized when you return to a website. More information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

*How do we use cookies?*

We use cookies to provide the website and services, gather information about your usage patterns when you navigate this website in order to enhance your personalized experience, and to understand usage patterns to improve our website, products, and services. We also allow certain third parties to place cookies on our website in order to collect information about your online activities on our website over time and across different websites that you visit. This information is used to provide advertising tailored to your interests on websites you visit, also known as interest-based advertising, and to analyze the effectiveness of such advertising.

Cookies on our website are generally divided into the following categories:

- Strictly Necessary Cookies: These are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas. These cookies are session cookies that are erased when you close your browser.
- Analytical/Performance Cookies: These allow us to recognize and count the number of users of our website and understand how such users navigate through our website. This helps to improve how our website works, for example, by ensuring that users can find what they are looking for easily. These cookies are session cookies which are erased when you close your browser. We use Google Analytics, and you can see below for how to control the use of cookies by Google Analytics.
- Functional Cookies: These improve the functional performance of our website and make it easier for you to use. For example, cookies are used to remember that you have previously visited the website and asked to remain logged into it. These cookies qualify as persistent cookies, because they remain on your device for us to use during your next visit to our website. You can delete these cookies via your browser settings.
- Targeting Cookies: These record your visit to our website and the pages you have visited and the links you have followed to recognize you as a previous visitor and to track your activity on the website and other websites you visit. These cookies qualify as persistent cookies, because they remain on your device for us to use during your next visit to our website. You can delete these cookies via your browser settings. See below for further details on how you can control third party targeting cookies.

*What are your options if you do not want cookies on your device?*

You can review your Internet browser settings, typically under the sections “Help” or “Internet Options,” to exercise choices you have for certain cookies. If you disable or delete certain cookies in your Internet browser settings, you might not be able to access or use important functions or features of this website, and you may be required to re-enter your log-in details.

To learn more about the use of cookies for Google Analytics and to exercise choice regarding such cookies, please visit <https://tools.google.com/dlpage/gaoptout>. The add-on available at the referenced link prevents the Google Analytics JavaScript (gtag.js, analytics.js) that is running on the Websites from sharing information with Google Analytics about visit activity and is specific to each browser running on each device from which you may visit the Website. The add-on is specific to Google Analytics as described above, and does not prevent data from being sent to the Websites themselves, or opt you out of every analytics service universally.

To learn more about certain cookies used for interest-based advertising by third parties, including through cross-device tracking, and to exercise certain choices regarding such cookies, please visit the [Digital Advertising Alliance](#), [Network Advertising Initiative](#), [Digital Advertising Alliance-Canada](#), [European Interactive Digital Advertising Alliance](#) or your device settings if you have the DAA or other mobile application.

6. Data Subject Rights. We offer our website users the right to obtain confirmation that we maintain certain Personal Data about you (and the right to verify its content, origin, to whom it is shared, and accuracy), as well as the right to access, rectify / correct, erase, restrict processing (i.e., withdraw consent without affecting the lawfulness of processing based on consent before its withdrawal), or port such data. In particular, you may have the right to instruct us to not sell or share your Personal Data with third-parties, object to our use of your Personal Data for direct marketing and/or targeted advertising purposes, and certain other purposes, at any time. You may also have the right to lodge a complaint with the competent data protection enforcement authority. Note, however, that we may retain certain Personal Data as required or permitted by applicable law.

You may exercise your data subject rights by contacting us with a reasonably detailed email, including “Data Subject Request” in the subject line, regarding the nature of your request at [DataProtectionOfficer@articlestudentliving.com](mailto:DataProtectionOfficer@articlestudentliving.com).

While we endeavor to resolve complaints quickly and informally, if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing by email to [dataprotectionofficer@ca-ventures.com](mailto:dataprotectionofficer@ca-ventures.com). Please include “Internal Appeals Process” in the subject line of your written complaint, and we will acknowledge your formal complaint within 10 working days of receipt. If we do not resolve your privacy complaint to your satisfaction, local law applicable to you may provide a specific process by which you may lodge a complaint with your state’s Attorney General, consumer protection or privacy protection agency.

In compliance with Colorado and Virginia law, consumers in those states, as applicable, may file a complaint with:

- The Colorado Attorney General’s Department of Law at 720-508-6000. More information is available at the Colorado Attorney General’s website: <https://coag.gov/file-a-complaint/data-privacy-data-breach/>.
- The Virginia Attorney General’s Office Main Line at 804-786-2071. More information is available at the Virginia Attorney General’s

website: <https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint>

Consumers in other states should check their own state's laws and attorney general's website for information on how to file data privacy complaints.

Unless otherwise required by applicable law, we reserve the right to take reasonable steps to verify your identity before responding to demands as set forth above.

Please note that, notwithstanding the fact that we may have removed your information from our list of active users, we reserve the right to keep any information submitted or collected for business and/or legal reasons, such as archiving data, and/or to establish legal claims or defenses.

7. Information Security. We maintain reasonable technical and organizational measures in accordance with our Data Protection Policy, to protect Personal Data from loss, misuse, alteration, or unintentional destruction. However, due to the inherently open nature of the Internet no security measure can guarantee against compromise. You also have an important role in protecting your Personal Data. You should not share your username and password with anyone, and you should not re-use passwords across more than one website. If you have any reason to believe that your username or password has been compromised, please contact us as detailed below. We cannot guarantee that communications between you and us or information stored on the websites or servers by us, or on our behalf, will be completely free from unauthorized access by third parties such as hackers and your use of any of the websites demonstrates your assumption of this risk.

8. Geography / Target Markets. We are a company located and operating solely within the United States of America. All of our business, properties, and operations are located within the United States of America and the websites are not targeted to, and we do not market our properties, to residents outside of the United States of America. The content found on the websites are controlled and published by Article Student Living from its offices in Chicago, IL, U.S.A. We make no representation that materials on the websites, and/or the operation of the websites are appropriate or available for use in other locations. Those who choose to access the websites from other locations do so on their own volition and are responsible for compliance with applicable local laws.



This website is not targeted at anyone under 13 years old and we do not intentionally market to or sell product to anyone under 13 years old. If you are under 13 years old please do not send us your personal data information (for example your name, address or email).

## 9. Other Issues.

### *(i) What are the consequences of not providing Personal Data?*

You are not required to provide all Personal Data identified in this Privacy Statement to use our website or to interact with us offline, but certain functionality will not be available if you do not provide certain Personal Data. If you do not provide certain Personal Data, we may not be able to respond to your requests, perform a transaction with you, review your application, or provide you with marketing that we believe you would find valuable.

### *(ii) Do we engage in automated decision-making without human intervention?*

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

### *(iii) How long do we retain Personal Information?*

We typically retain Personal Data related to marketing activities for as long as you accept marketing communications from us and upon request, we will securely delete such data in accordance with applicable law. For Personal Data that we collect and process for other purposes, as described above, we retain such Personal Data in accordance with our Records Retention and Protection Policy, and typically, for no longer than the period necessary to fulfil the purposes outlined in this Privacy Statement, and as otherwise needed to address tax, corporate, compliance, employment, litigation, and other legal rights and obligations.

### *(iv) Are third party websites governed by this Privacy Statement?*

This website contains links and references to other websites (e.g., LinkedIn, Instagram, Twitter, Facebook) administered by unaffiliated third parties. This Privacy Statement does not apply to such third party websites. When you click a link to visit a third party website, you will be subject to that website's privacy practices. We encourage you to familiarize yourself with the privacy and security practices of any linked third party websites before providing any Personal Data on those websites.

### *(v) How will we handle any changes to this Privacy Statement?*

We may update this Privacy Statement from time-to-time as our services and privacy practices change, or as required by law. The effective date of our Privacy Statement is posted above, and we encourage you to visit our website periodically to stay informed about our privacy practices. We will post the updated version of the Privacy Statement on our website, and ask for your consent to the changes if legally required.

## 10. California Privacy Rights

**Shine the Light.** Under California's "Shine the Light" law, California residents who provide certain personally identifiable information in connection with obtaining products or services for personal, family, or household use are entitled to request and obtain from us once per calendar year information about the information that we shared with other businesses for their own direct marketing uses. If applicable, this information would include the categories of information and the names and addresses of those businesses with whom we shared information for the immediately prior calendar year. To obtain this information, please contact us at [DataProtectionOfficer@articlestudentliving.com](mailto:DataProtectionOfficer@articlestudentliving.com) with "Request for California Privacy Information" in the subject line and in the body of Your message. We will provide the requested information to you at your email address in response. Please be aware that not all information sharing is covered by the "Shine the Light" requirements, and only information on covered sharing will be included in our response. We may ask for additional information to verify your identity.

**Do Not Track.** Given the divergent practices of organizations that offer browsers and the lack of a standard in the marketplace, we do not respond to DNT signals at this time.

**Consumer Rights Notice.** Please see Section 6 above for details as to how to exercise your consumer / data subject rights. Under California Civil Code Section 1789.3, we are required to provide California residents with the following specific consumer rights information:

- This website is owned and operated by Article Student Living.
- Unless otherwise expressly stated, this website is provided without charge.
- To file a complaint regarding this website or to receive further information regarding use of this website, please send a letter to

311 N. Green St., Ste. 850, Chicago, IL 60607, or contact us via email at [DataProtectionOfficer@articlestudentliving.com](mailto:DataProtectionOfficer@articlestudentliving.com).

Non-Discrimination. If you exercise any of your consumer / data subject rights with respect to selling or sharing of your Personal Data provided for under California law, we shall not discriminate or retaliate against you for choosing to exercising any of your data subject rights, including by: (a) denying goods or services to you; (b) charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties; (c) providing a different level or quality of goods or services to you;; (d) suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

11. Contact Us. If you have questions or comments regarding this Privacy Statement or our privacy practices, please contact us at [DataProtectionOfficer@articlestudentliving.com](mailto:DataProtectionOfficer@articlestudentliving.com).