

Privacy Policy

College Town Communities (“College Town Communities,” “we,” “us,” or “our”) respects the privacy of our users (“you” or “your”) and shares your concerns about the protection of the personal information that we collect from you. This Privacy Policy governs the websites that College Town Communities and our affiliates, subsidiaries, and related entities operate (individually and collectively, the “Website”). This Privacy Policy applies to the data collected by us, or those working on our behalf, through the information you enter or from the imported data from authorized and approved sources.

You should read this Privacy Policy before sharing any personal information with College Town Communities or before using the Website.

By using or accessing our Website in any manner, you acknowledge that you accept the practices and policies described in this Privacy Policy, and you hereby consent that we may collect, use, and share your information as described herein. If you do not agree to the Privacy Policy, please exit the Website immediately.

What This Policy Governs

We will only collect personal information reasonably needed to provide our services to you. This Privacy Policy will explain what personal information we may collect from you, how that information is used, and how you can contact us to modify previously submitted information or limit our use of it. We will take reasonable precautions to protect the privacy of any visitors to this Website, including our residents, guarantors, applicants, prospective residents, clients, or prospective clients.

This Website may contain links to other sites not affiliated with or controlled by College Town Communities, including social-networking sites. You acknowledge that we do not monitor or control the websites or privacy practices of these or any other third parties and are not

responsible for their practices or the content of their websites. We provide links on the Website to third party sites only as a convenience, and the inclusion of a link on our Website does not imply our endorsement of the linked site. This Privacy Policy does not apply to information collected by any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our Website. You should review the privacy policies of such third parties to understand how they collect and use information.

What Information We Collect and How We Collect It

College Town Communities receives two types of data about you: (a) “Personally Identifiable Information” – that is, information from which an individual can be identified, such as your name, email address, home address, and telephone number, that you may provide when using some of the Website’s features; and (b) “Tracking Data,” which is automatically collected from every visitor to our Website (collectively, “Personal Information”). Our collection of Personal Information is described in more detail below.

Personally Identifiable Information. We collect and store information from you when you submit forms or applications on our Website, contact us through phone or email, respond to surveys, or utilize a resident portal account. Although you are not required to share any Personal Information with us, declining to provide such information may limit our ability to provide services to or communicate with you.

Residential Applicants and Lease Guarantors. Anyone applying to live at one of our communities or to guarantee a lease for another person applying to live at one of our communities will be asked for information needed to process an application, including: (a) name, (b) address, (c) telephone number, (d) email address, (e) social security number, (f) date of birth, and (g) your preferences regarding your future apartment. We will use this information to process the application and also to contact the applicant and/or guarantor.

Current Residents. Any resident of one of our communities has provided College Town Communities with Personally Identifiable Information, including: (a) name, (b) address, (c) telephone number, (d) email address, (e) social security number, (f) and date of birth. We will use this information to complete your resident profile and also to contact you regarding your residency with us. We will share only your name, telephone number, email address, and lease term with potential roommates in your apartment and also with third party vendors who provide resident services at your community, such as utility billing, package services, or marketing services on behalf of College Town Communities.

Prospective Residents. Anyone submitting a form on this Website to obtain more information about College Town Communities or any of our communities will be asked for information needed to provide the requested information, including: (a) name, (b) address, (c) telephone number, and (d) email address. We will use this information to contact you for marketing and solicitation purposes.

Also, we may receive information about you from third parties. For example, if you are on another website and you opt-in to receive information from us, that website will forward to us your email address and other information about you so that we may contact you as requested. This may include information about you provided to us by your college or university in accordance with their policies on sharing of personal information.

Tracking Data and Analytics. Tracking Data consists of information we collect automatically from each Visitor, such as browser type, operating system, Internet service provider, IP address, and referring page or site. Tracking Data may include information such as the pages you visit and features you use, the total number of your Website or page visits, your search terms, and the average time you spend on a page or area of the Website.

College Town Communities uses Tracking Data to create aggregate reports on visitor demographics, Website traffic patterns and user

behavior, and may provide these reports to advertisers and other third parties.

We may combine the Tracking Data we collect from you with your Personal Information and use the combined information for our own customer research and marketing purposes, such as to identify which Website users we think are most likely to lease an apartment in the near-term. We may share the results of that research with third parties, but we will not share the combined information with any third party for its own marketing or other use.

We do not control third-party tracking technologies or how they may be used. If you have any questions about any target content, you should contact the responsible provider directly.

Financial information connected to payments may be collected and stored by a third-party payment processor and payment is subject to their terms and policies.

Use of Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit the Website, we may collect information from you automatically through cookies or similar technology. College Town Communities uses cookies in a range of ways to improve your experience on the Website, including keeping you signed in and understanding how you use our website.

There are a number of different types of cookies that our website uses:

1. **Functionality** – College Town Communities uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and your location. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.

2. Essential – These cookies are essential to allow you to browse our Website and use its functions. Without them, services such as electronic invoicing would not work.
3. Advertising – College Town Communities uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. We sometimes share some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.
4. Analytics – College Town Communities may use analytics cookies, which are sometimes called performance cookies, to collect information about your use of the Websites and enable us to improve the way they work. Analytics cookies collect information about how you use the Websites, for instance, which pages you go to most. The information allows us to see the overall patterns of usage, help us record any difficulties users may have while using the Websites and show us whether or not our advertising is effective. These cookies do not collect information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.

You can set your browser not to accept cookies or refuse cookies when you enter certain sites, including this one. You may also limit the information we are able to gain from certain cookies by logging into our Websites directly, rather than through any social media credentials. However, some of the Website's features may not function as a result of disabling cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

Advertising

College Town Communities does not currently use any outside advertising company ("Advertiser") to serve banner or other advertisements on the Website. However, College Town Communities

reserves the right to use an Advertiser to serve such advertisements in the future. If so, please be advised that such Advertisers may place cookies in your browser's cookie file, which would enable such Advertisers to record which ads your browser has seen, and which Website pages you may have been viewing when the ads were delivered. Such cookies would only be able to be viewed by the applicable Advertiser(s), and not by College Town Communities.

How We Use Information We Collect

College Town Communities uses your Personal Information in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

1. To present, operate or improve the Website and services, including analysis of Website activity;
2. To inform you about services and products available from College Town Communities;
3. To provide you with notices about your account, including expiration and renewal notices;
4. To carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection;
5. To authorize access to our Websites and services;
6. To provide, maintain, administer, or expand the services, or for other internal purposes to support, improve or enhance our business and the services we offer;
7. To offer and administer programs;
8. To customize or tailor your experience of the services;
9. To administer content, or other Website features;
10. To communicate about, and administer your participation in, special programs, surveys, contests, online campaigns, online programs, and other offers or promotions, and to deliver pertinent emails;
11. To improve our Website and services;
12. To secure our services;

13. To use statistical information that we collect in any way permitted by law, including from third parties in connection with their commercial and marketing efforts;
14. To respond to and support you regarding your use of the Websites and services;
15. To comply with all applicable legal requirements;
16. To perform data analysis and testing;
17. To investigate possible fraud or other violations of our Privacy Policy and/or attempts to harm our users;
18. To resolve disputes;
19. To improve products and services;
20. To otherwise fulfill the purpose for which the information was provided; and
21. In any other way that we may describe when you provide the information.

We use the information we collect from our Websites to provide, maintain, and improve them, to develop new services, and to protect our company and our users.

We use information collected from cookies and other technologies to improve your experience and the overall quality of our services. We may use your Personal Information to see which web pages you visit at our Website, which web site you visited before coming to our Website, and where you go after you leave our Website. We can then develop statistics that help us understand how our visitors use our Website and how to improve it. We may also use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

Your Failure to Provide Personal Information

Your provision of Personal Information is required in order to use certain parts of our services and our programs. If you fail to provide

such Personal Information, you may not be able to access and use our services, or parts of our services.

Sharing Information

College Town Communities may disclose your Personal Information to commercial providers for a business purpose. When we disclose Personal Information for these reasons, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except for the purposes set forth in the contract.

College Town Communities does not sell your information; however, it may be necessary to share your information with third parties in certain business or legal circumstances, as detailed below.

College Town Communities works with third parties who provide services that may include, but are not necessarily limited to, website hosting, data analysis, email services, and other services of an administrative or technical nature. College Town Communities reserves the right to share Personal Information collected on this Website with those third parties for the purpose of providing such services.

Notwithstanding any other provision of this Privacy Policy, we reserve the right to disclose your Personal Information to third parties under any of the following circumstances: when we believe in good faith that the law permits it (for example, in response to a court order or a subpoena); to our legal advisors; to enforce our Terms of Service; to protect the rights, property, safety or security of College Town Communities, our residents, or the public; or to respond to an emergency.

We attempt to notify consumers about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the

requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

We may disclose your Personal Information in the event of a business transfer. If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, Personal Information about our users is often a transferred business asset. In the event that College Town Communities itself or substantially all of our assets are acquired, Personal Information about our users may be one of the transferred assets.

Security

College Town Communities takes reasonable measures in accordance with applicable laws to safeguard users' Personal Information. While College Town Communities strives to protect your Personal Information and therein your privacy, we cannot guarantee the security of any information. Such information is provided to us at your own risk. Our policies do not extend to the general operation of the Internet, which is beyond our control. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measure contained on the Website or used with our Services.

We limit access to Personal Information to employees who will reasonably need to receive such information to perform their jobs and provide our services to you, but we take precautions we deem reasonable to protect the security of users' Personal Information. We inform our employees of the sensitivity of the data submitted to us and instruct them to handle it with care to limit improper access by third parties. However, as in many computer systems, Internet applications and software programs, unauthorized use, failure of hardware or software, etc. may be harmful to the confidentiality of users' Personal Information.

The safety and security of your information also depend on you. Where we have given you or where you have selected a password for access to certain parts of our Website or Services, you are responsible for maintaining the confidentiality of this password. You should not share this password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or electronic device and browser by signing off after you have finished accessing your account. The information you share in public areas may be viewed by other users.

Email Consent and Opt-Out

By entering your Personal Information through any forms on this Website you are providing affirmative consent for us to contact you through any method you shared, including email and telephone. We may contact you to send information or notices related to the property where you live or other properties that may be of interest to you. We may also email information regarding the use of the Website or its services, or changes to our Privacy Policy.

Each marketing or solicitation email will contain a link with instructions to opt-out of such communications. If you are a resident of a College Town Communities community, you are not able to opt-out of all communications, like emergency notices.

Further, if you are subscribed to College Town Communities emails and also emails from any properties managed by College Town Communities, you must unsubscribe from each location's emails separately. If you are receiving emails from a third party you connected to from this site, you will also need to opt-out of their emails separately.

How Long We Store Your Data

We determine the appropriate retention period for Personal Information on the basis of the amount, nature and sensitivity of your Personal Information processed, the potential risk of harm from

unauthorized use or disclosure of your Personal Information, and whether we can achieve the purposes of the processing through other means, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).

Your Rights and Choices

You may have certain rights relating to your Personal Information, subject to local data protection law. Whenever you use our services, we aim to provide you with choices about how we use your Personal Information. We also aim to provide you with access to your Personal Information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law and upon your request, we will provide you with copies of your Personal Information, make reasonable efforts to remove your Personal Information from our active databases, or correct any erroneous information. To make this request, email us at corporate@collegetowncommunities.com. In accordance with applicable law, and to help protect your privacy and security, we will take steps to verify the identity of any individual making such a request. Such information will be corrected or deactivated as soon as reasonably possible. We reserve our right to deny a deletion request when we must maintain your information for the purpose of completing transactions; upholding legal obligations; maintaining security and existing functionality; and allowing for internal, expected, and lawful uses based on your expected relationship with our business.

European Privacy Rights

The European Union's General Data Protection Regulation ("GDPR"), and corresponding legislation in the United Kingdom, provide European and United Kingdom residents with certain rights in connection with Personal Information you have shared with us. If you are resident in the European Economic Area and the United Kingdom, you may have the following rights:

1. **The right to be informed.** You are entitled to be informed of the use of your Personal Information. This Privacy Policy provides such information to you.
2. **The right to access.** You have the right to request copies of your Personal Information from College Town Communities.
3. **The right to correction** – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete any information you believe is incomplete.
4. **The right to erasure** – You have the right to request that we erase your Personal Information, under certain conditions. Note, however, that deletion of your Personal Data will likely impact your ability to use our services.
5. **The right to restrict or object to processing** – You have the right to request that we restrict the processing of your Personal Information, or fully object to our processing of your personal data, under certain conditions.
6. **The right to data portability** – You have the right to request that we transfer your data to another organization, or directly to you, under certain conditions.
7. **The right to refuse to be subjected to automated decision making, including profiling:** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
8. **The right to lodge a complaint with a supervisory authority.** A list of Supervisory Authorities is available here:
http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you would like to exercise any of these rights, please contact us via email at corporate@collegetowncommunities.com or write to us:
College Town Communities | Attn: Data Protection Officer | 40 Lloyd Avenue, Suite 100, Malvern, PA 19355

Children

The Website or services are not intended for use by children. We do not intentionally gather Personal Information about visitors who are under the age of 16. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16 in the applicable jurisdiction, please contact us at corporate@collegetowncommunities.com. If we learn that we have inadvertently collected the personal information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

How to Contact Us

If you have any questions or concerns about this Policy, our Terms and Conditions, or how your own information has been collected or used, please contact us via email at corporate@collegetowncommunities.com, or by mail or telephone at:

College Town Communities | Attn: Data Protection Officer | 40 Lloyd Avenue, Suite 100, Malvern, PA 19355 | 610.314.3223

Changes to Policy

We reserve the right to make changes to this policy at any time without notice. Although we may notify you of updates via any contact information provided, we are not required to do so. It is your responsibility to review this policy for modifications each time you visit the Website, which will be indicated by the “last revised on” date at the top of this page. Your continued use of the Website is considered an acceptance of any and all changes to this policy.