

# Privacy Policy

Effective Date:

## Scope of this Policy

This privacy policy applies to:

- \_\_\_\_\_ (“we,” “us,” “our”).
- \_\_\_\_\_ online properties (including our websites and websites or mobile applications that link to it), our social media pages or handles, our products, and services (the “Services”).

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may change this Policy from time to time. If we do, we will notify you by posting the updated version.

## Information We Collect

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

### *Information you give us*

You may provide the following information to us directly:

- Contact information, including name, email address, and telephone number.
- Demographic information.
- Rental application information, including Social Security Number, Driver’s License Number, State Identification Number, emergency contact information, work history, and prior residences.
- Payment information, including account information.
- Information contained in your communications to us, including call recordings of customer service calls.
- Content you may include in survey responses.
- Information you make available to us via a social media platform.
- Any information or data you provide when interacting with our chatbots or within our resident portal.
- Information you submit to inquire about or apply for a job with us.
- Any other information you submit to us.

### *Information we collect automatically*

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services. We also create records when you interact with the Services.

- *Device information*, including IP address, device identifiers, and details about your web browser.

- *Analytical information*, including details about your interaction with our Services, website, app, and electronic newsletters.
- *Diagnostic information*, including web traffic logs.
- *Business record information*, including records of your purchases of products and services and use of our Services.

### *Information We Collect From Other Sources*

We may collect the following information about you from third-party sources.

- Information about your credit history from credit reporting agencies.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements that we place on third-party websites.

### **How We Use Your Information**

We may use any of the information we collect for the following purposes.

- **Application Processing:** To process your application to rent one of our properties.
- **Service functionality:** To provide you with our products and services, including to take steps to enter a contract for sale or for services, bill or invoice for services, process payments, fulfill orders, send service communications (including renewal reminders), and conduct general business operations, such as accounting, recordkeeping, and audits.
- **Service improvement:** To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- **Advertising and marketing:** To send you marketing communications and measure the effectiveness of our advertising. We may share your information with advertising partners for this purpose.
- **Security:** To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent theft, unauthorized use, or abuse of the Services and other activities that may violate our policies or be fraudulent or illegal.
- **Legal compliance:** To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal and regulatory requirements.

### **How We Share Your Information**

We may share any of the information we collect with the following recipients.

- **Affiliates:** We share information with other members of our group of companies.
- **Service providers:** We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these business functions, which include:
  - *Supporting Service functionality*, such as vendors that support event registration, customer service and customer relationship management, subscription fulfillment, freight services, application development, list cleansing, postal mailings, and communications (email, fax).
  - *Auditing and accounting firms*, such as firms that help us create our financial records.
  - *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.

- *Analytics and marketing services*, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
- *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
- *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
- *Marketing vendors*, such as entities that support distribution of marketing emails.
- *Building renter credit history*, such as service providers that, with your consent, may share your rental payment history with credit reporting agencies and offer renters additional benefits.
- **Business partners:** From time to time, we may share your contact information with other organizations for marketing purposes.
- **Online advertising partners:** We partner with companies that assist us in advertising our Services, including partners that use online tracking technologies to measure the effectiveness of our advertising.
- **Social media platforms:** If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- **Government entities/Law enforcement:** We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the health and safety of our employees, contractors, customers, or other individuals.
- **Other businesses in the context of a commercial transaction:** We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

## Security

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

## Your Options and Rights Regarding Your Information

**Email Unsubscribe:** If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, please contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

**Ad Choices:** You have options to limit the information that we and our partners collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our online properties.

- The following industry organizations offer opt-out choices for companies that participate in them: the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and the [European Interactive Digital Advertising Initiative](#).
- You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you.

If you delete your cookies, you may also delete your opt-out preferences.

**Do Not Track:** Your browser or device may include “Do Not Track” functionality. Our information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy regardless of whether a Do Not Track signal is received.

**Jurisdiction-specific rights:** You may have certain rights with respect to your personal information depending on your location or residency. Please see “privacy disclosures for specific jurisdictions” below. Please contact us to exercise your rights.

## Special Information for Job Applicants

When you apply for a job with us, we may collect information from you, including:

- Information you provide in connection with your application.
- Information that you make available in your social media accounts.
- Information about you that is available publicly.
- Information that you authorize us to collect via third parties, including former employers or references.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

## Other Important Information

### *Data retention*

We may store information about you for as long as we have a legitimate business need for it.

### *Cross-border data transfer*

We may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

### *Information about children*

The Services are intended for users who are sixteen years old and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of sixteen, we will delete that information. Please contact us with any concerns.

### *Sharing of Medical or Health Information*

If we receive protected health information about you, that information is subject to electronic disclosure as permitted by applicable law.

## Privacy Disclosures for Specific Jurisdictions

### California

#### Your California Privacy Rights; “Shine the Light” Law

California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their own direct marketing purposes in the preceding calendar year. Please contact us to obtain this information.

We do not share your personal information with third parties for those third parties’ direct marketing purposes.

#### California Consumer Privacy Act

The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, correct, delete, and limit disclosure of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. If we collect personal information subject to the CCPA, that information, our practices, and your rights are described below.

#### Notice at Collection Regarding the Categories of Personal Information Collected

You have the right to receive notice of certain information about our data collection, use, and disclosure. The following table summarizes the categories of personal information we collect; the categories of sources of that information; whether we disclose, sell, or share that information to service providers or third parties, respectively; and the criteria we use to determine the retention period for such information. The table also summarizes the categories of “sensitive” personal information that we collect, the purposes for which such information is used, and whether we sell or share such information. The categories we use to describe personal information are those enumerated in the CCPA. We collect this personal information for the purposes described above in “How We Use Your Information.”

Category	Information Type	Source	We disclose to:	We sell to/share with:
Identifiers	<ul style="list-style-type: none"> <li>Contact information or personal characteristics (name; email address; postal address; telephone number; signature)</li> <li>Social media handles</li> </ul>	You; our social media pages	Service Providers	Not sold/shared
Financial Information	<ul style="list-style-type: none"> <li>Payment card data</li> <li>Bank account information</li> <li>Credit information</li> <li>Transaction data</li> <li>Rental payment history</li> </ul>	You	Service Providers	Not sold/shared
Protected Classifications and Other Sensitive Data	<ul style="list-style-type: none"> <li>Social Security Number</li> <li>Driver’s License Number</li> <li>Date of Birth</li> <li>Gender</li> <li>Background check information</li> </ul>	You; credit reporting agencies	Service Providers	Not sold/shared
Commercial Information	<ul style="list-style-type: none"> <li>Transaction information</li> <li>Billing and payment records</li> <li>Order history</li> </ul>	You	Service Providers	Not sold/shared
Geolocation Information	<ul style="list-style-type: none"> <li>Coarse (information that describes location at ZIP code-level or less precision)</li> </ul>	You; our analytics and advertising partners	Service Providers	Not sold/shared

Internet or Electronic Network Activity Information	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Device identifier (e.g., MAC, IMEI)</li> <li>• Advertising identifier (e.g., IDFA, AAID)</li> <li>• Information provided in URL string (e.g., search keywords)</li> <li>• Cookie or tracking pixel information</li> <li>• Voice Service usage</li> <li>• Video Service usage</li> <li>• Information about your interaction with our website, app, email correspondence, or products</li> <li>• Diagnostic information (e.g., crash logs, performance data)</li> </ul>	You; our analytics and advertising partners	Service Providers	Not sold/shared
Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information	<ul style="list-style-type: none"> <li>• Call recordings</li> <li>• Photographs</li> <li>• Video</li> </ul>	You	Service Providers	Not sold/shared
Professional or Employment-Related Information	<ul style="list-style-type: none"> <li>• Current employer</li> <li>• Job title</li> </ul>	You	Service Providers	Not sold/shared
Education Information	<ul style="list-style-type: none"> <li>• Education history</li> <li>• Level of education</li> </ul>	You	Service Providers	Not sold/shared
Content of Communications	<ul style="list-style-type: none"> <li>• Contents of voice calls, voicemails, emails, or text messages</li> </ul>	You	Service Providers	Not sold/shared
Communications Metadata	<ul style="list-style-type: none"> <li>• Call detail</li> <li>• Text Detail</li> </ul>	You; Service Providers	Service Providers	Not sold/shared
Contacts	<ul style="list-style-type: none"> <li>• Emergency contact information</li> </ul>	You	Service Providers	Not sold/shared

We determine the retention period for each of the categories of personal information listed above based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

Entities to whom we disclose information for business purposes are *service providers*, which are companies that we engage to conduct activities on our behalf. We restrict service providers from using personal information for any purpose that is not related to our engagement.

Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. A company may be considered a third party either because we disclose personal information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for purposes unrelated to the service it provides to us. A business “shares” personal information when it discloses personal information to a company for purposes of cross-context behavioral advertising.

#### *Your rights under the CCPA*

- *Opt out of sale or sharing of personal information:* You have the right to opt out of the sale or sharing of your personal information to third parties, however, we do not sell or share your personal information to third parties. This right to opt out does not apply to our disclosure of personal information to service providers.

- *Know and request access to and correction or deletion of personal information:* You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers to whom we sell, share, or disclose it. You also have the right to request in certain circumstances that we correct personal information that we have collected about you and to delete personal information that we have collected directly from you. Please contact us to exercise these rights.

## Contact information, submitting requests, and our response procedures

### Contact

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email: [privacy@tmo.com](mailto:privacy@tmo.com)

Mail: PO Box 90708, Camden, NJ 08101

### Making a request to exercise your rights

**Submitting requests:** You may request to exercise your rights by submitting the form on [this page](#) or making a request using the contact information above.

You may, under certain circumstances, authorize another individual or a business, called an authorized agent, to make requests on your behalf.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Verification:** We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.