



## **PRIVACY POLICY**

*Effective: March 13, 2025*

Welcome to Lifestyle Communities' Privacy Policy ("Policy"). For purposes of this Policy, the terms "Lifestyle Communities" "we," "us," and "our" refer to Lifestyle Communities, Ltd., Lifestyle Property Management, Ltd., Billy Goat Tavern, Ltd. d/b/a "The Goat", Code Wellness, LLC d/b/a "CODE Wellness", Lifestyle Real Estate Services, Ltd. d/b/a "Collective House Realty", and its respective affiliates, subsidiaries, parents, members, and managers. "You" or "your" refers to you, as a user of our services, including any use of our websites, and software applications, whether operated by us or on our behalf ("Services"). It is important that you read this Policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing your Personal Information so that you understand how and why we are using your data. This Policy supplements those other notices and is not intended to override them.

### **This Policy describes:**

- Personal Information We Collect;
- How We Collect Your Personal Information;
- How We Use Your Personal Information;
- How We Disclose Your Personal Information;
- State Privacy Rights;
- Changes to the Policy; and
- Questions About This Policy

### **PERSONAL INFORMATION WE COLLECT**

**"Personal Information"** means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household. It does not include anonymous or aggregated data that cannot be associated with an individual or household.

We may collect, combine, analyze, use, store, and transfer different kinds of Personal Information about you, which we have grouped together as follows:

**Identifiers** such as first name, middle name, maiden name, last name, alias, username or similar unique personal identifier, account name, online identifier, social security number, driver's license number or other government ID, date of birth, mother's maiden name, and identifiers for family members.

**Characteristics of protected classifications under California or other state or federal law**, such as sex/gender, marital status, and age.

**Contact Information** such as current address, previous address, billing address, email address, telephone numbers, and emergency contact information and relationship.

**Financial Information** such as bank account number, routing number, credit or debit card number, online payment user information, and payment details.

**Commercial Information** such as details about payments to and from you, other details of products and services you have purchased from us, or payment history.

**Professional or Employment-Related Information** such as your current employer, salary, and employment status.

**Vehicle Information** such as the type, make, model, year, color, and license plate number for you and any family members living with you.

**Pet Information** such as the name, type, breed, color, weight, age, license number, vet information, vaccination and rabies shot records, and microchip details for any family pets.

**Audio, Electronic, and Visual Information** such as call and video recordings.

**Internet and Other Electronic Network Activity Information** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Services.

**Usage Data** includes information about how, where and when you use our Services.

**Marketing and Communications Information** such as marketing campaign data, click-throughs, your preferences and consent in receiving marketing from us and our third parties, email and text communications, and your communication preferences.

**Inference Data** including inferences drawn from the Personal Information identified above.

## **SENSITIVE PERSONAL INFORMATION**

We collect Personal Information that is defined as “Sensitive Personal Information” under California law, including social security number, driver’s license number, or other government ID. We do not use or disclose Sensitive Personal Information for any business purposes other than as permitted by law, including providing goods and services, verifying your information, and/or as permitted by further regulations. We may also collect, use, and share “Aggregated Data” such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Information but is not considered Personal Information as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this privacy notice.

## **HOW LONG WE WILL USE YOUR PERSONAL INFORMATION**

We will only retain your Personal Information for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your personal data, and whether

we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

### **INFORMATION YOU PROVIDE TO A THIRD PARTY**

The Services may include links and plug-ins to websites and/or applications operated by third parties such as Twitter, Facebook, and Instagram buttons (“Third-Party Sites”). Lifestyle Communities does not control any Third-Party Sites and is not responsible for any information they may collect. The information collection practices of a Third-Party Site are governed by the privacy policy of such third parties. It is your choice to enter any Third-Party Site. We recommend that you read its privacy policy if you choose to do so.

### **CHILDREN’S PRIVACY**

The Services are intended for adult use only and are not directed toward children, minors, or anyone under the age of 18, and by using the Services, you are certifying that you are not under the age of 18. If you are under the age of 13, you are not authorized to provide us with any Personal Information and you should not submit any personal information to us. To the extent that we receive Personal Information of a child under 13 from their parent or guardian, we do not sell this information.

### **HOW WE COLLECT YOUR PERSONAL INFORMATION**

We may collect Personal Information from a variety of sources and methods. This includes:

#### ***Information you voluntarily provide to us***

You may give us your Personal Information by filling in forms, filling out a rental application or lease, or by corresponding with us by post, phone, text, email, or otherwise. This includes Personal Information you provide when you:

- Submit a contact form
- Call, email, or text or communicate with us in any way
- Fill out a rental application and pay a down payment
- Make or initiate purchases via our Services
- Sign a lease
- Create an account on our Resident Portal
- Request maintenance or repair services
- Report criminal or civil disturbances
- Order or purchase other products and services
- Attend our events where we collect information about you
- Submit a review or testimonial

#### ***Information we collect when you use our Services***

Automated technologies or interactions: As is true of most websites, we receive and store certain types of Personal Information whenever you interact with us online. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. When you access and use our Services from your mobile devices, we receive data from that mobile device. This may include your device ID, location data, IP address, and device type. You may manage how your mobile device and mobile browser share location information with

us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to the instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

**Cookies:** Cookies, and other similar technologies such as web beacons, pixel tags, are small files that we or our service providers use to help us understand how users use the Services and to enable us to provide or improve the Services. For example, cookies gather information about how long you spend on a web page so that we can understand what web pages are of most interest to users. While specific types of cookies and technologies may change from time to time as we improve and update the Services, cookies used by the Services generally fall into the categories below:

**Security and Authentication (Strictly Necessary Cookies):** These cookies are essential to provide you with the Services and to use some of its features, such as access to secure areas. Without these cookies, we cannot provide parts of the Services that you request, such as secure login accounts and transactional pages.

**Performance and Functionality Cookies:** We use performance cookies to analyze how the Services are being accessed and used, or how the Services are performing to maintain, operate and continually improve the Services and provide a better overall user experience. Functionality cookies record information about choices you've made and allow us to customize the Services to you. When you continue to use or return to the Services, we can remember choices you make (such as login credentials, language preference, country location or other online settings) and provide the personalized or enhanced features that you select. We also employ Google Analytics and Hubspot to help understand how the Services are used.

**Social Networks:** Some technologies help you to interact with social networks you are signed into while using the Services, such as sharing content with the social network, logging in with the social network, and other features you employ with the social network, or that are allowed in the social network's privacy policy. These may be set and controlled by the social networks, and your references with those social networks. You can manage your privacy preferences for these social networks and their tools and widgets via your account with the social network.

**Advertising or Targeting Cookies:** These cookies allow us and third parties to gather information about the content you're browsing, your visit, or your interaction with ads and our communications, and to display ads that are relevant to you and measure their effectiveness. Certain third-party cookies may also track your activity across various sites to display ads relevant to you and your interests on third-party sites and applications. Most advertising or targeting cookies set by the Services belong to our service providers.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies by adjusting your browser settings. For more information about cookies and about turning off cookies, please see <http://www.allaboutcookies.org>. If you turn off your cookies, some of the features of the Services may not function properly.

### ***Information we collect from Third Parties***

We collect Personal Information from various third parties, including those listed below. The collection, use, and disclosure of Personal Information received from third parties is governed by the privacy policies listed on the website where the information was submitted by the user. Third parties may send their own cookies and pixel tags to you, and may collect information and use it in a way inconsistent with this Policy. Please carefully review these third-party privacy policies to understand how your information may be collected, used, and disclosed by these third parties.

Third-Party Service Providers. We collect Personal Information from service providers including where we operate accounts on third-party platforms, such as online application submission and management platforms, email platforms, and social media platforms.

Third-Party Advertising Partners. We collect Personal Data received from third-party advertising partners, including partners who host and manage various advertisements and online forms where you can request additional information.

Google Analytics. We use third-party cookies provided by Google Analytics to assist us in better understanding our website visitors. Google Analytics uses a first-party cookie, identifiers for mobile devices, or similar technology to collect usage data. Based on this information, Google Analytics compiles data about website traffic and interactions, which we use to offer better user experiences, perform analytics, analyze traffic, personalize content, and offer ads that match your interest. You can learn more about how Google Analytics collects and uses information from our website at: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

Your “Do Not Track” Browser Setting. Some web browsers incorporate a “Do Not Track” feature (“DNT”) that signals to the websites that you visit that you do not want to have your online activity tracked. Many websites and applications, including the Services, do not currently respond to web browser DNT signals because such signals are not yet uniform. For more information about DNT signals, please visit <http://allaboutdnt.com>. Other third-party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

## **HOW WE USE YOUR PERSONAL INFORMATION**

Our primary purpose for collecting Personal Information is to provide you with the Services, products, and other services you request. We may also use your Personal Information for the following business purposes:

- Processing rental applications, running credit checks, verifying information, generating leases, providing maintenance and repair services, obtaining payment, managing our properties, communicating and managing our customer relationship with you;
- For our marketing activities, which include, but are not limited to, sending you material about products, services, updates, etc. that we think may be of interest to you and to customize the advertising and content you see;
- For internal business purposes such as complying with our internal policies, analyze how our Services are being accessed and used, or improving our Services;
- To protect our interests, including establishing, exercising and defending legal rights and claims;
- As necessary to comply with legal requirements, to enforce our lease terms, to prevent fraud, to co-operate with law enforcement and regulatory authorities, and to stop other prohibited, illegal, or harmful activities; and
- For purposes disclosed at the time you provide your information or as otherwise set forth in this Policy.

## **HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

We disclose your Personal Information with third parties only in the ways that are described in this Policy and with our business partners, suppliers, and subcontractors in order to provide you with our Services and perform any contract we enter into with them or you.

**Information You Instruct Us to Disclose.** You may be presented with an option on our Service to have us send certain information to third parties or give them access to it. If you choose to do so, your Personal Information and other information may be disclosed to such third parties and all information you disclose will be subject to the third-party privacy policies and practices of such third parties.

**Service Providers.** We may use third-party service providers to perform certain business services on behalf of us or the Service and may disclose Personal Information to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose, or retain the Personal Information to provide these services and are prohibited from selling Personal Information. Business services provided include but are not limited to, maintenance and repair services, hosting services, software as a service, document management services, communications services such as email, text, and chat services, software and website development services, collection services, accounting and audit services, compliance services, quality control services, analytics services, call center services, housing services, marketing services, employment, and employment verification services.

**Internal Third Parties.** We may disclose Personal Information to our parent company, subsidiaries, and other companies owned by or controlled by Lifestyle Communities who may use the Personal Information for the purposes described above.

Categories of Personal Information that have been disclosed to service providers and internal third parties for a business purpose in the past twelve months include:

- Identifiers
- Characteristics of protected classifications under California or other state or federal law
- Contact Information
- Financial Information
- Commercial Information
- Professional or Employment-Related Information
- Vehicle Information
- Pet Information
- Audio, Electronic, and Visual Information
- Internet and Other Electronic Network Activity Information
- Usage Data
- Marketing and Communications Information
- Inference Data

**Business Transactions.** We may do business with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change of ownership happens to our business, then the new owners may use your Personal Information in the same way as set out in this Policy.

**Legal Process.** Subject to applicable law, we may disclose information about you (i) if we are required to do so by law, regulation or legal process, such as a subpoena; (ii) in response to requests by government entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate

to prevent physical, financial or other harm, injury or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.

**Personal Information Sold or Shared.** We have not sold any Personal Information in the past twelve months. We have shared Personal Information in the past twelve months with our third-party advertising partners to serve ads to you about our products and Services as you browse the Internet. “Sharing” is defined under California privacy law as “renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.” This sharing means that these third-party service providers may use their own cookies or tags to track your online activities and purchases in order to deliver targeted advertising based on your interests. If your browser supports it, you can turn on the Global Privacy Control (GPC) to opt out of the “Sharing” of your Personal Information. Learn more at the Global Privacy Control website. Lifestyle Communities has no actual knowledge of any sales or sharing of Personal Information of minors under 16 years of age.

## **CALIFORNIA PRIVACY RIGHTS.**

**California Consumer Privacy Act.** The California Consumer Privacy Act as amended (“CCPA”) provides California residents with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

**Right to Know:** You have a right to know what Personal Information we have collected about you in the immediately preceding 12-month period, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we have disclosed Personal Information and the specific pieces of Personal Information we have collected. You may exercise this right no more than twice in any 12-month period.

**Right to Delete:** You have the right to request that we delete Personal Information that we collected from you and retained, subject to certain exceptions.

**Right to Correct:** You have the right to correct inaccurate personal information that we maintain about you.

**Right to Opt-Out of the Sale or Sharing:** You have the right to opt out of the sale or sharing of your Personal Information by the business. We do not sell your Personal Information.

**Right to Limit the Use or Disclosure of Sensitive Personal Information:** You have the right to request that we limit the use and disclosure of sensitive personal information to specific business purposes approved by the CCPA. Our use of sensitive Personal Information is already limited to the approved business purposes identified above.

**Right to Non-Discrimination:** Unless permitted by applicable law, we will not discriminate against you for exercising any of your privacy rights under the CCPA or applicable law, including by, but not limited to:

- Denying you goods or Services;
- Charging you different prices or rates for goods or Services, including through the use of discounts or other benefits or imposing penalties;

- Providing you a different level of quality of goods or Services; or
- Suggesting that you will receive a different price or rate for goods or Services or a different level of quality of goods or Services.

**Exceptions.**

These rights are not absolute and are subject to certain exceptions. For example, we cannot disclose or permit access to specific pieces of Personal Information if granting your request would present a certain level of risk to the security of the Personal Information at issue, your account with us or the security of the website. We may deny your deletion request if retaining the information is necessary for us or our service providers and/or contractors to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

***California Privacy Rights.*** California Civil Code Section 1798.83 permits California residents who have provided personally identifiable information to us or our third-party advertisers and marketing partners, if any, to request certain information regarding our disclosure of personally identifiable information to third parties for direct marketing purposes. Please be aware that not all information sharing is covered by the requirements of Section 1798.83 and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

**Exercising your California and Colorado Rights**

Requests can be submitted by calling our number (614-918-2000) or through our online request form (<https://lifestylecommunities.com/contact>). You can also opt out of having Personal Information shared with third parties for cross-context behavioral or targeted advertising by clicking on the “Your Privacy Choices” link. Additionally, if your browser supports it, you can turn on the Global Privacy Control (GPC) to opt out of the sharing data for targeted online advertising. You can learn more about the GPC and how to enable it in your browser from the [Global Privacy Control](#) website.



Please note that these rights apply only to California and Colorado consumers. Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

### **Authorizing an Agent to Act on Your Behalf**

Except where you have provided an agent with a Power of Attorney pursuant to Sections 4000 – 4465 of the California Probate Code, when using an authorized agent you must: (i) provide the agent with signed written permission clearly describing their authority to make a request on your behalf; (ii) verify your own identity; and (iii) directly confirm that you have provided the authorized agent permission to submit the request. We may deny a request from an authorized agent if the agent does not provide us with the signed written permission demonstrating that they have been authorized to act on your behalf.

### **Verifying Your Request**

The verifiable consumer request must:

- Include your full legal name and phone number, which we will need to contact you in order to verify that you are the person about whom we collected Personal Information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. In order to verify your identity, one of our representatives will call you at the phone number provided.

### **RESPONSE TIMING AND FORMAT**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

**Residents of other states, including Colorado, Connecticut, Delaware, Iowa, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Texas, Tennessee, Nevada, Utah, and Virginia may have additional privacy rights. Based on the applicable law in the state where you live, you may have the following rights with respect to your Personal Information:**

- To confirm whether or not a controller is processing your personal data and to access such personal data;
- To correct inaccuracies in your personal data;
- To delete your personal data;
- To obtain a copy of your personal data that you previously provided to us in a portable, and if technically feasible, readily usable format, if processing is carried out by automated means;
- To opt out of the processing of your personal data for purposes of:
  - targeted advertising;
  - the sale of personal data; or

- profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.
- Not to discriminate against you because you have exercised any of these rights, including by:
  - denying you Services;
  - charging different prices or rates for our Services, including through the use of discounts or other benefits or imposing penalties;
  - providing you a different level or quality of Services; and/or
  - suggesting that you will receive a different price or rate for Services, or at a different level or quality of Services.

**It is your obligation to regularly review your state's privacy laws to understand the specific privacy rights and protections afforded to you under your state's laws, which may differ from those outlined in this Policy, and to be aware of how to exercise those rights when interacting with the Services.**

#### **CHANGES TO THIS PRIVACY NOTICE**

Lifestyle Communities may modify or update this Policy from time to time. We encourage you to revisit this page often to remain fully informed of our Policy or you can contact us at any time to obtain the latest copy of this Policy. Where changes to this Privacy will have a fundamental impact on the nature of how we collect, use, or share your data, Lifestyle Communities will give advance notice of such changes.

#### **QUESTIONS ABOUT THIS POLICY**

For questions or comments regarding our Policy, please contact us at:

Email: [privacy-policy@lifestylecommunities.com](mailto:privacy-policy@lifestylecommunities.com)