

# Southhampton Management Inc.

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## AI Privacy Policy

**Effective Date:** September 1, 2025

**Last Updated:** September 1, 2025

Southhampton Management and SUEBA USA ("we," "our," or "us") are committed to protecting your privacy. This AI Privacy Policy explains how we collect, use, share, and protect personal information when you interact with our Leasing AI Tool, powered by Entrata, through our website or affiliated platforms. This policy also reflects our obligations under **Texas law**, including the **Texas Data Privacy and Security Act (TDPSA)**.

### 1. Overview of the AI Leasing Tool

Our AI Leasing Tool is an automated assistant designed to help prospective and current residents with leasing questions, property details, availability, scheduling tours, and other related tasks. This tool is powered and supported by Entrata, our third-party property management software provider.

### 2. Information We Collect

When you interact with the AI tool, we may collect the following types of information:

#### a. Personal Information

- Full name
- Email address
- Phone number
- Apartment preferences (e.g., number of bedrooms, budget, location)
- Preferred move-in date
- Communication preferences

#### b. Usage Information

- Chat interaction logs
- Pages visited
- Session time and date
- Browser, device, and operating system details

#### c. Automatically Collected Data

- IP address
- Geolocation (approximate)
- Language and time zone settings
- Clickstream and interaction behavior

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### 3. How We Use Your Information

We use the data we collect for the following purposes:

- To provide personalized leasing assistance
- To automate apartment search and match preferences
- To schedule tours and follow up on requests
- To improve the functionality and accuracy of our AI tool
- To ensure security and monitor for abuse or misuse
- To comply with state and federal regulations

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### 4. Disclosure of Information

We do **not sell** your personal information. We only share information under the following limited circumstances:

- **With Entrata** – our authorized property management platform, under data processing agreements
- **With internal staff** – to support your leasing process or customer service needs
- **With service providers** – for AI functionality, analytics, hosting, and security
- **As required by law** – to comply with legal requests, subpoenas, or court orders
- **In a business transaction** – such as a merger, acquisition, or sale of assets

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### 5. AI Use and Transparency Notice

As required by **Texas law**, we disclose the following:

- Our Leasing Tool **uses artificial intelligence (AI)** to simulate human-like interactions for informational and support purposes.
- You are **interacting with an AI system**, not a human.
- The AI does **not make legally binding decisions**, nor does it collect sensitive categories of data (e.g., biometric, health, or financial data).
- If you prefer to speak with a human representative, you may do so at any time by requesting it within the chat or contacting us directly.

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### 6. Your Rights Under Texas Law

Under the **Texas Data Privacy and Security Act (TDPSA)**, effective July 1, 2024, Texas residents have the following rights:

#### a. Right to Access

You may request a copy of the personal information we have collected about you.

#### b. Right to Correction

You may request that we correct inaccuracies in your personal information.

#### c. Right to Deletion

You may request that we delete the personal information we collected from you, subject to certain exceptions.

**d. Right to Data Portability**

You may request your information in a portable, readily usable format.

**e. Right to Opt-Out**

You may opt out of:

- The processing of personal data for targeted advertising
- The sale of personal data (we do not sell data)
- The use of personal data for profiling in furtherance of decisions that produce legal or similarly significant effects.

We will not discriminate against you for exercising your rights.

To exercise any of these rights, please email us at [jhitt@suebausa.com](mailto:jhitt@suebausa.com) or call us at **713-747-6601**. We will respond within 45 days, as required by law.

**7. Data Security Measures**

We implement reasonable administrative, technical, and physical safeguards to protect your information, including:

- Encrypted data transmission
- Access controls and authentication
- Secure server infrastructure and software patches
- Employee training and access limitations

However, no method of online transmission or storage is 100% secure. You use our services at your own risk.

**8. Data Retention**

We retain your information only for as long as necessary to fulfill the purposes described in this policy or as required by law. We may retain anonymized or aggregated data for internal research or performance monitoring.

**9. Children’s Privacy**

Our services are intended for individuals 18 years or older. We do not knowingly collect or process data from children under 13. If we become aware that we have collected personal information from a child, we will delete it promptly.

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## 10. Updates to This Policy

We may update this AI Privacy Policy periodically. When we do, we will revise the "Last Updated" date above and may notify you through prominent notices on our website or via email.

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## 11. Contact Information

If you have questions about this AI Privacy Policy or your rights under Texas law, please contact:

**Southhampton Management / SUEBA USA**

[www.s-h-m.com](http://www.s-h-m.com)

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