

Baldwin & Sons Privacy Policy

Welcome to the Baldwin & Sons Privacy Policy (the “Policy”). For purposes of this Policy, the terms “Baldwin” “we,” “us,” and “our” refer to Baldwin Asset Management, Inc. and Baldwin & Sons, Inc. and each of their 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”) and/or enter into a lease at one of our communities (“Products”). 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 Share Your Personal Information With Third Parties;
- How We Protect Your Information
- California 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, use, store and transfer different kinds of Personal Information about you, which we have grouped together as follows:

- **Identifiers** such as your first name, maiden name, last name, account username, social security number, driver’s license number, military identification or other state issued identification, passport number, date of birth, marital status, gender, and identifiers of your family members in your household.
- **Contact Information** such as your current address, billing address, email address, telephone numbers, community name for current residents, and emergency contact information.
- **Financial Information** such as certain financial data including your bank account number, routing number, credit or debit card number, insurance policy/surety bond information, and

payment details.

- **Residential and Commercial Information** about products and services provided to you, such as payments to and from you, lead forms, desired move in date, unit of interest, documentation relating to your leases, ledger history, utility consumption and expenses, property notices and communications, rent payment history, fee payment history, and other details related to property management and resident history.
- **Professional or Employment-Related Information** such as your current employer, employment history, salary, income 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, microchip details for any family pets.
- **Audio, electronic, and visual information** such as call and video recordings.
- **Technical 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 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, and your communication preferences.

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.

Information You Provide To A Third Party. The Services may include links and plug-ins to websites operated by third parties such as social media sites, news publications and rental listing sites, such as Zillow.com (“Third-Party Sites”). Baldwin 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.

Information You Provide to Affiliated Sites. The Services may include links to other websites offered by Baldwin & Sons, Inc., its builders, and all of their respective affiliates, subsidiaries, parents, members, and managers. The information collected by this affiliated websites are governed by the privacy policies provided on such websites, which may differ from this Policy.

Children's Privacy. The Products and Services are intended for adult use only and is not directed towards children, minors, or anyone under the age of 18. If you are under the age of 13, you are not authorized to provide us with any Personal Information. 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 Us request, General Inquiry, Registration Card or otherwise request information
- Submit a customer service form
- Apply to take a tour
- Call, email, or text us
- Submit a rental application
- Complete a Lease Agreement
- Create an account and interact with our Resident Portal
- Attend our events or go to our leasing center where information is collected about you
- Order or purchase other products or services from us
- Request maintenance or repair services
- 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 instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

Cookies. Cookies are small data files that we or our service provider transfers to your computer's hard drive through your web browser that enables us or our service provider's systems to recognize your browser and capture and remember certain information. We use cookies to help

us understand how users use 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. 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 lease management platforms, resident portal and customer relationship management platforms, listing agent 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. These cookies collect IP address and usage data, such as the length of time a user spends on a page, the pages a user visits, and the websites a user visits before and after visiting our website. Based on this information, Google Analytics compiles Aggregate Data about website traffic and interactions, which we use to offer better user experiences and tools in the future. For more information on Google Analytics, visit <https://support.google.com/analytics> .

Third Party Cookies. We may engage third-party service providers, including Google, CallRail, Dialogtech, and Facebook, to serve ads to you about our products and services as you browse the Internet, as well as for call tracking and marketing analytics. These third-party providers may use their own cookies tags to track your online activities and purchases in order to deliver targeted advertising based on your interests. You can learn more about Google's advertising cookies and opt-out options by visiting <http://www.google.com/policies/technologies/types/> . You can learn more about Facebook's advertising cookies and opt-out options by visiting <https://www.facebook.com/policy/cookies/> . You can learn more about CallRail's analytics and opt out options by visiting <https://www.callrail.com/privacy/> . You can learn more about Dialogtech's analytics and opt out options by visiting <https://www.dialogtech.com/about/privacy-policy/> .

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 products and services you request. We may also use your Personal Information for the following business purposes:

- To provide you with information, products and/or services you request
- To process rental applications and screen applicants
- For lead generation of potential applicants
- To run credit checks in connection with your rental application
- To generate and manage leases for our tenants
- To manage our properties and our customer relationship with you
- To respond to your inquiries when you contact us
- To communicate with individuals in written, electronic, and verbal form
- To provide maintenance and repair services
- To obtain payment for services that we provide to you, including your rental payments
- For marketing purposes, which include, but are not limited to, sending you material about products, services, and updates that we think may be of interest to you
- To customize the advertising and content you see
- For internal business purposes such as operating business emails, complying with our internal policies or improving our Products or Services
- To analyze how our Products and Services are being accessed and used
- To verify information
- 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
- For purposes disclosed at the time you provide your information or as otherwise set forth in this Policy

HOW WE SHARE PERSONAL INFORMATION WITH THIRD PARTIES

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

Information You Instruct Us to Share. You may be presented with an option on our Products and 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 Products and Services, 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 and credit verification services.

Internal Third Parties. We may share Personal Information with our affiliates, subsidiaries and other companies owned by or controlled by Baldwin who may use the Personal Information for the purposes described above.

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 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.

Sales of Personal Information. Like most companies, we allow certain third party advertising partners to place tracking technology such as cookies and pixels on our websites. This technology allows these advertising partners to receive information about your activities on our website, which is then associated with your browser or device. These companies may use this data to serve you more relevant ads as you browse the internet. Under some state laws, sharing data for online advertising may be considered a “sale” of information.

HOW WE PROTECT YOUR INFORMATION

We endeavour to incorporate reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, mobile networks, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Therefore, we cannot guarantee its absolute security. It may be possible for third parties to intercept or access transmissions or private communications unlawfully. Any such transmission is done at your own risk.

CALIFORNIA PRIVACY RIGHTS.

California Consumer Privacy Act. The California Consumer Privacy Act of 2018 (“CCPA”) provides California residents with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Upon verification of your identity you may:

- No more than twice in any 12-month period, request disclosure of the following information:
 - Categories of Personal Information we collect.
 - Categories of sources from which Personal Information is collected.
 - Categories of Personal Information sold or disclosed to third parties.
 - Categories of third parties with whom such Personal Information is sold or disclosed.
 - Business or commercial purpose for collecting or selling Personal Information.
 - Specific pieces of Personal Information we collect.
- Request deletion of your Personal Information, subject to the exceptions provided by law.
- Opt-out from having your Personal Information sold to third parties, if applicable.

Requests can be submitted by calling 619-515-9112 or through our online request form. You can also opt out of having Personal Information transmitted through third-party cookies and pixels by clicking on the “Do Not Sell My Info / Cookie” link [Data Subject Access Request](#)

Please note that these rights apply only to select California consumers and exclude job applicants, employees, and business contacts. Only you, or a person registered with the California Secretary of State 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. 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: (1) provide the agent with signed 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. That agent must also be able to verify their identity with us and provide us with their authority to act on your behalf.

The verifiable consumer request must:

- Include your full legal name, email address, 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.
- 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. You may need to provide additional information in order to verify your request. Depending on the nature of the request, we may require additional verification actions be taken, including but not limited to providing a signed declaration under penalty of perjury that you are the consumer whose Personal Data is the subject of the request. We will only use this information to verify the requestor's identity or authority to make the request.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) 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's achievement, 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.

- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

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.

No Discrimination

The CCPA provides the right to be free from discrimination if you choose to exercise your rights under the statute, and Baldwin will not discriminate by:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of goods or services.
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services

Other 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. Requests should be submitted via email to lmason@baldwinsons.com and should include CALIFORNIA PRIVACY RIGHTS in the subject line. We will need your first and last name, mailing address, and email address in order to process your request. 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.

CHANGES TO THIS PRIVACY NOTICE

Baldwin 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, Baldwin will give advance notice of such changes.

QUESTIONS ABOUT THIS POLICY

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

Baldwin Asset Management

Attn: Lisa Mason

email: CustomerService@baldwinsons.com or lmason@baldwinsons.com

Phone: 619-515-9112