

Privacy Policy of Newbury Residential, Inc.

Effective Date: July 22, 2025

1. Your Privacy Rights

General

This Privacy Policy describes how **Newbury Residential, Inc.** and its affiliates (collectively, “Newbury,” “we,” “our,” or “us”) collect, use, and safeguard information obtained from you via our website and offline interactions. This policy applies to data we collect through:

- Our primary website: <https://www.newburyresidential.com>
- Our resident and employee portals, including application and payment platforms
- Offline interactions at our offices or residential properties

If you are unsure whether a site or entity is affiliated with Newbury Residential, please contact us at **corporate@newburyresidential.com** or call **(413) 798-9989**.

2. Acceptance of This Privacy Policy

By accessing our website, submitting applications, making payments, or providing personal information in person, you acknowledge and agree to the terms of this Privacy Policy. If you do not accept this policy, please discontinue use of the website and services.

This Privacy Policy does not apply to third-party websites, products, or services not owned or controlled by Newbury. Please review Section 3 for more information.

3. Links to Third-Party Sites

Our platforms may contain links or integrations with third-party services (e.g., rental applications, payment processors). These sites are governed by their own privacy policies, not ours. We encourage you to review their practices before sharing personal information.

4. Types of Information We Collect

A. Personal Information

We collect personal information voluntarily provided by you, including but not limited to:

- Full name, date of birth, and contact information
- Residential history and employment details
- Social Security number, driver's license, and government-issued ID numbers
- Financial details such as income, credit card information, and billing addresses
- Emergency contact and employment-related data for applicants/employees

B. Information from Other Sources

We may also collect information from third parties, such as background check providers or credit agencies. If combined with information we directly collect, this data will be treated in accordance with this Privacy Policy.

C. Non-Personal Information

We collect data that does not directly identify you, such as:

- Browser and device details
- IP and MAC addresses
- Web browsing behavior on our site
- Usage metrics and geographic location

This data may be collected using **cookies**, **web beacons**, and other **tracking technologies** ("Collection Technology").

You can manage your cookie preferences through your browser settings. However, disabling cookies may limit your website experience.

5. Use and Sharing of Information

A. How We Use Personal Information

We may use your information to:

- Process leasing, employment, or service applications
- Complete transactions and payments
- Provide resident support

- Communicate important updates and service notices
- Customize your website experience
- Conduct marketing (with opt-out options available)
- Comply with legal obligations

By providing your information, you consent to communication via email, phone, text, or other means regarding the services you engage with.

B. When We Share Personal Information

We may share your personal data with:

- **Service Providers** such as background check agencies, payment processors, IT vendors, and benefits administrators
 - **Affiliates** and property owners managed by Newbury
 - **Promotions and Contests** partners (subject to specific contest rules)
 - **Legal Authorities** if required by law or to protect rights and safety
 - **Successors** in connection with corporate transfers or reorganizations
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6. Use of Non-Personal Information

We use non-personal information for:

- Site administration and improvement
- User experience personalization
- Marketing campaign analysis and targeted advertising

We may share de-identified or aggregated data with third parties for analytics and advertising. We participate in the **Digital Advertising Alliance (DAA)** and honor opt-out preferences as outlined at <https://www.aboutads.info/choices>.

7. Data Security

We implement reasonable security measures to protect your personal data. However, no system is completely secure. Transmissions over the internet are inherently risky, and we cannot guarantee absolute protection.

8. Data Retention and Disposal

Newbury maintains personal information for as long as necessary to fulfill its purposes or as required by law. We use secure disposal methods, such as shredding or digital deletion, to prevent unauthorized access.

9. California Privacy Rights

“Shine the Light” Law (CA Civil Code §1798.83)

California residents can request details about personal data shared with third parties for their marketing purposes. To make such a request, email **corporate@newburyresidential.com** with the subject line **"California Privacy Request"**.

Do Not Track Disclosure

Newbury currently does not respond to "Do Not Track" browser signals.

10. Children’s Privacy

Our websites are not directed at children under 13. We do not knowingly collect personal information from minors. If you are a parent or guardian and believe we have collected information from a child, please contact us immediately.

11. Updating Your Information

To access, correct, or delete your personal data, contact us at **corporate@newburyresidential.com**. In some cases, users may make changes through our resident or employment portals.

12. Policy Changes

We reserve the right to update this Privacy Policy. The effective date will reflect the latest version. Continued use of our services signifies acceptance of changes. We may provide notice of significant updates in accordance with applicable law.

13. International Users and Data Transfers

All data is stored and processed in the United States. By using our websites and services, you consent to the transfer of your data to the U.S.

14. Contact Us

For questions or concerns about this Privacy Policy or your personal data:

Email: corporate@newburyresidential.com

Phone: (413) 798-9989

Mailing Address: 734 Longmeadow St., Suite 315, Longmeadow, MA 01106