

PRIVACY POLICY

Effective Date: 04/30/2025

Your Acceptance Through Express Consent

By using the Site, you agree to the terms of this Privacy Policy. If you do not agree with our policies and practices, do not use our Site.

This Privacy Policy describes how we collect, use, and disclose information that relates to you or that can be reasonably linked to you ("**Personal Information**") in connection with the websites we control.

Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, and other factors. We will let you know when we update this Notice by updating the "Effective Date" at the top. Any changes will become effective when we post the revised Privacy Policy.

How and Where We Collect Your Personal Information

We may collect or you may choose to provide Personal Information in various ways, such as when you visit the Sites, use the Services, apply for a job, post to social media pages, participate in a survey, search for an apartment, enter into a transaction or contractual arrangement with us, participate in our programs or activities, provide Personal Information at events, visit our facilities, contact our customer service, make any inquiries and communications with us, or from other sources including publicly accessible databases, credit agencies, third party data providers, service providers, advertising sources, affiliates, and joint marketing partners.

Personal Information We Collect

The types of Personal Information we may collect from you, or you may choose to provide, include the following:

- **Personal Identifiers**, such as first and last name, postal address, email address, account name or login credentials, government-issued identifiers (for example, Social Security number, taxpayer identification number, passport number, student or identity card), date of birth, picture, government-issued identity documents (for example, driver's license), and emergency contact information.
- **Records Information**, such as name, contact information, signature, email address, phone number, financial information including financial account number, bank account number, credit/debit card numbers, credit history, rental payment details, and employment information.
- **Demographic Information**, such as age, race, color, ancestry, national origin, citizenship, marital status, sex, veteran or military status, criminal history, in each case subject to applicable laws. In certain jurisdictions, you may also choose to share with us any disabilities or other health-related restrictions as part of our review to ensure any accommodation request meets the FHAct guidelines.
- **Employment Information**, such as employer name or company affiliation, job title, work email address, and work phone number, employment history, university or school attended, diploma, other CV information, pay history, and income.
- **Commercial Information**, such as transactions, credentials to online services and platforms, bank account numbers, credit or debit card numbers, credit information, utility bills, insurance claimant information, lease information, rental history, financial account information, business email, business telephone, account balances, billing information, and records of sales, purchases, and uses.
- **Internet or Network Activity Information**, such as browsing history and interactions with our advertisements, your computer IP address, your device identifier (model, software, etc.), mobile app identifiers, cookie

identification number, your location, time zone setting, browser type and version, what pages you view or visit, and your social media interactions with us, such as when you “like” a post.

- **Sensory Data**, such as pictures, videos, sounds, and electronic content produced by individuals using our systems, including online interactive and voice communications such as through email, phone, network sessions, or because of video cameras in our facilities.
- **Inferences** that are drawn from any of the Personal Information listed above to create a profile about, for example, an individual’s preferences, characteristics, or behavior.

How We Use Personal Information

- **Communicating:** To engage in activities related to community tours, rental applications, and leasing apartments. Providing and improving our customer service. Tracking and responding to inquiries, reports, reviews, or correspondence, for example, when you send us questions, suggestions, compliments or complaints, or when you request further information. Facilitating communications generally in the context of our business activities. Sending administrative information, such as changes to our terms, conditions, and policies.
- **Marketing:** To conduct surveys about your experience with us. Sending you marketing emails with information about availability, pricing, or other news. To re-engage with prospective clients who have expressed an interest in our product and Services.
- **Operations and General Business Purposes:** To perform the obligation of a contract: the development, compliance and undertaking of legal and contractual obligations, payments, and debt collection. Accounting, recordkeeping, backup, and administrative purposes. Processing and completing transactions, and sending you related information, including alerts and notifications. Data analysis, for example, to improve the efficiency of our Services. Audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements. Fraud prevention and fraud security monitoring purposes, detecting incidents and illegal activity, complying with legal obligations. Providing maintenance or other services, managing the property, improving or modifying our current Services.

Third-Party Websites

The Sites may contain links to other third-party websites. The information practices and content of such third-party websites are governed by their own privacy notices. We encourage you to review the privacy notices of such third-party websites to understand their information practices.

Who We Disclose Personal Information To

We may share Personal Information with the following third parties to provide you services, following a specific request from you, or to fulfill our legal obligations.

- **Affiliates.** We may disclose Personal Information to any of our subsidiaries and affiliates to fulfill our contract with you and accomplish our business purposes.
- **Service Providers.** We disclose Personal Information and Other Data to third parties who perform services such as pest control, appliance repair, utility companies, hosting our websites, providing our information technology systems, supporting outsourcing arrangements, processing payments, conducting research and analytics, providing on-site services, providing benefits, conducting financial, identity and other legal checks and providing professional advice. Some of these service providers may use your Personal Information for their own purposes and legal obligations, and where this is the case, these service providers are therefore considered separate data controllers.
- **Property Owners & Managers.** We disclose Personal Information to the Owners of the properties we manage. Owners may use your Personal Information for their own purposes and legal obligations and are therefore considered separate data controllers for multiple processes during your tenancy journey. We disclose your

Personal Information to Managers who assist us with the management of your property and/or who may take over management responsibilities from us.

- **Legally Compelled Disclosure.** We disclose Personal Information and Other Data to government authorities in accordance with applicable laws. We may also use and disclose your Personal Information as necessary to comply with applicable laws, respond to requests or requirements from government authorities, enforce our terms and conditions, or to otherwise protect the rights, property, or safety of employees, residents and other persons, including exchanging information with third parties for fraud protection and credit risk reduction.

Children's Privacy

We do not knowingly collect Personal Information from children under the age of sixteen without authorization by a holder of parental responsibility. If you believe that we may have collected Personal Information from or about a child under the age of sixteen, please send an email to inforecipient@graycopartners.com. If we become aware that we have collected Personal Information from anyone under the age of 13 without verification of parental consent, we take steps to remove that information.

How We Protect Your Personal Information

Although we use commercially reasonable organizational precautions regarding your Personal information collected from and stored on the Site, due to the open nature of the Internet, we cannot guarantee that any of your Personal Information stored on our servers, or transmitted to or from a user, will be free from unauthorized access, and we disclaim any liability for any theft or loss of, unauthorized access or damage to, or interception of any data or communications. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure.

- ***By using our Site or other services, you acknowledge that you understand and agree to assume these risks.***
- If you have reason to believe that your interaction with us is no longer secure, please immediately notify us at inforecipient@graycopartners.com.

Retaining Your Personal Information

We will retain your Personal Information for the period we believe reasonable to fulfill the purposes for which we hold it unless a longer retention period is required or permitted by law. Our retention periods depend upon the length of time we have an ongoing relationship with you and provide the services to you; whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations).

Choices Regarding Your Information

You may opt out from:

- Receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by following the "unsubscribe" option contained in any such email.
- Receiving other promotional text communications, like SMS. If you no longer want to receive marketing related texts, you may opt out by replying "STOP" to any message you may receive from us.

Keeping Your Information Updated

It is up to you to keep your Personal Information with us current. You can update your Personal Information by logging into your account. If you are unable to update your Personal Information, please let us know.

How We Use Cookies

By using the Site, you agree to our use of cookies.

A cookie is a small text file that a website stores on your personal computer, telephone, or any other device, with information about your navigation on that website. Cookies facilitate browsing and a more user-friendly experience. A cookie contains the name of the server it came from, the expiry of the cookie, and a value – usually a randomly generated, unique number. Cookies do not give access to nor damage your device.

We use browser session cookies, which are temporary cookies that are erased from your device’s memory when you close your internet browser or turn your computer off, and persistent cookies, which are stored on your device until they expire, unless you delete them before that time.

- **Necessary / Essential Cookies:** These cookies are necessary to enable the basic features of this Site to function, such as identifying you as a valid user, ensuring that no one else can sign on simultaneously with your account from another computer, and helping us serve you better based on your registration preferences.
- **Performance Cookies:** These performance tracking cookies help us to track whether an email recipient has completed an event, such as signing up for a free trial. Such information is non-personally identifying and collected on an aggregate level. We sometimes utilize third-party service providers to help us track the activity.
- **Functionality Cookies:** These cookies allow us to analyze your use of the Site to evaluate and improve our performance. They may also be used to provide a better customer experience on this Site. For example, providing us information about how our Site is used and helping us facilitate promotions or surveys.
- **Targeting Cookies:** These cookies may be used to share data with advertisers so that the ads you see are more relevant to you, allow you to share certain pages with social networks, or allow you to post comments.
- **Performance Tracking:** We sometimes use cookies, as well as tracking technology, such as web beacons, within the promotional emails that we send to our subscribers or advertisements for our Site. These performance tracking devices help us to track whether an email recipient has completed an event, such as signing up for a free trial. Such information is non-personally identifying and collected on an aggregate level.
- **Do Not Track:** We currently do not respond to “Do Not Track” signals from your browser.

We sometimes utilize third-party service providers to help us track the activity within our Site. These third parties may use temporary cookies and/or web beaconing technology to facilitate such tracking, but the data would not be tracked in a personally identifiable way. Third parties whose products or services are accessible on our Site may also use cookies, and we advise you to check their privacy policies for information about their cookies and other privacy practices.

- **Avoiding Use of Cookies on this Site:** If you prefer to completely prevent us from using cookies on your devices, before navigating on this Site, you must first disable the use of cookies in your browser and then delete the cookies saved in your browser associated with this Site.
- **Disabling and Preventing Further Use of Cookies:** You may restrict, block, or delete the cookies from this Site at any time by changing the configuration of your browser.

AI TOOLS

We may offer certain AI tools, which may include any AI chatbots including those that use Microsoft’s generative pre-trained transformer language models known as GPTs. The AI chatbot does not collect Personal Information unless you voluntarily input such information. We may use the prompts submitted by users to improve the quality of the AI chatbot responses; however, the prompts used for quality improvement purposes do not identify an individual, unless the user voluntarily provided their Personal Information. Prompts are shared with AI Tools solely to provide the AI chatbot service. The AI chatbot is not used for the purpose of automated decision making.

Your Rights Under the CCPA

Some state laws, such as the California Consumer Privacy Act (“CCPA”), permit residents to exercise certain rights regarding their Personal Information. If you are a California resident, you have the following rights:

- **Right to Know:** You may request information about the categories and specific pieces of personal information we have collected about you.
- **Right to Delete:** You may request deletion of your personal information.
- **Right to Opt-Out:** You have the right to opt out of the sale of your personal information (Note: We do not sell personal data).
- **Right to Non-Discrimination:** We will not discriminate against you for exercising your CCPA rights.

To exercise these rights, please email us at inforecipient@graycopartners.com. We may need to verify your identity before processing your request.

How to Contact Us

If you have any questions or complaints related to our practices with respect to the collection, use, or disclosure of Personal Information, please feel free to contact us at inforecipient@graycopartners.com. If by written mail, please send to:

Grayco Partners
55 Waugh Drive, Suite #500
Houston, Texas 77007