# **Barrington Residential Inc. Privacy Policy**

Last Modified on: March 25, 2025

#### 1. Introduction

This policy describes how Barrington Residential Inc. and its affiliated entities ("Company" or "We") may collect, use, share, retain and protect your Personal Information through this website (the "Website"). This privacy policy applies to your Personal Information, which can include any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you, your house, or your device ("Personal Information").

Please read this policy carefully. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Please click on the following links to go to the corresponding sections of this privacy policy:

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# 2. <u>Information our Privacy Policy Covers</u>

This privacy policy applies to Personal Information the Company obtains in various contexts, including:

- On this Website;
- In email and other electronic messages between you and Company;
- From third party service providers, such as Entrata, Inc.

It does not apply to information collected by us offline or through any other means.

Our Website may have links to websites and/ or applications operated and maintained by third parties. We have no control over the privacy practices of websites or applications we do not own and encourage you to review all third party privacy policies carefully.

#### 3. **Information We Collect**

The Personal Information that we collect from you depends on how you interact with us and our services. We have listed the categories of Personal Information and the specific pieces of Personal Information we have collected within the last twelve (12) months below

We will not sell the Personal Information we collect. We also will not share it with third parties for cross-context behavioral advertising.

Typically, we retain your Personal Information for the period necessary to fulfill the purposes outlined in this privacy policy, unless a longer retention period is required or permitted by law. Please note that in many situations we must retain all, or a portion, of your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes.

- **Personal Identifiers**, such as first and last name, email address, account name or login credentials, date of birth, government-issued identifiers (for example, Social Security number), government-issued identity documents (for example, driver's license), signature, and phone number.
- **Employment Information**, such as employer name or company affiliation, job title, previous employment, and educational history.
- Commercial Information, such as transactions, credit information, account balances, billing information, and records of leases, rental payments, and other commercial transactions.
- Internet or Network Activity Information, such as browsing history.
- **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.

### 4. <u>Information Collected by Entrata, Inc.</u>

Entrata, Inc., our property management service provider, processes certain transactions (including credit checks and payment transactions) on our behalf and may receive Personal Information (including financial account information, credit card information, government identifiers or government identifying documents) from you or from us in connection with the performance of these services. If you use our Website to pay for your rent, any Personal Information you enter into Website is sent directly from your browser to Entrata, Inc. to process payment transactions on our behalf. [The payment information that you send directly to Entrata, Inc. is exchanged for a token (limited to only the last four digits of the payment card, expiration date, type of card and email address, which the Company stores on our servers.) We do not store your full payment card information. We use SSL encryption

for all traffic between your browser and our servers.]<sup>1</sup> Entrata, Inc. is independent of the Company and has its own privacy and security policies which can be found <u>here</u>.

# 5. How We Collect your Personal Information:

We collect Personal Information about you from various sources, including:

- **Directly from you**, such as.
  - Information that you provide by filling in forms on our Website. This includes information provided at the time of creating an account our Website, applying to one of our rental properties, or requesting further services. We may also ask you for information when you report a problem with our Website.
  - Records and copies of your correspondence (including email addresses), if you contact us.
  - Your responses to surveys that we might ask you to complete for research purposes.
  - Details of transactions you carry out through our Website.
  - Your search queries on the Website.
  - When you sign up to receive emails.
  - When you apply for a job.
- Third-Party Data Providers, We may obtain Personal Information about you from third party data providers, such as Entrata, Inc., as well as from other service providers and affiliates which are subsidiaries of Barrington Residential, Inc.
- Other Sources, We may obtain Personal Information about you from fraud prevention service providers or publicly available sources. We also create information based on our analysis of the information we have collected from you.

# 6. <u>Automatic Data Collection Technologies</u>

As you navigate through and interact with our Website, we use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns.

The technologies we use for this automatic data collection may include:

Cookies (or browser cookies). A cookie is a small file placed on the hard drive of
your computer. You may refuse to accept browser cookies by activating the
appropriate setting on your browser. However, if you select this setting, you may be
unable to access certain parts of our Website. Unless you have adjusted your browser
setting so that it will refuse cookies, our system will issue cookies when you direct
your browser to our Website.

<sup>&</sup>lt;sup>1</sup> Please confirm.

Web Beacons. Pages of our Website [and our emails] may contain small electronic
files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel
gifs) that permit the Company, for example, to count users who have visited those
pages or [opened an email] and for other related website statistics (for example,
recording the popularity of certain website content and verifying system and server
integrity).

# 7. How We Use your Personal Information

We may use or disclose the Personal Information we collect for one or more of the following purposes:

- **Providing Our Website**. We use Personal Information to provide our Website and its content to you, including to provide, personalize, support and develop our Website. We may use Personal Information to allow you to participate in the interactive features of our Website, to notify you about changes to our Website and any services we offer through it.
- **Providing Services**. We use Personal Information to fulfill or meet the reason you provided the information. This includes:
  - Processing and completing transactions, and sending you related information, including alerts and notifications about your rental property, which may be through Entrata, Inc.;
  - Audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;
  - Enhancing, improving, repairing, maintaining, or modifying our current properties and services; and
  - Accounting, recordkeeping, backup, and administrative purposes.
- Communicating with You. We use Personal Information to:
  - Provide you with support and to respond to your inquiries, including to investigate
    and address your concerns, follow up on your issues and feedback, and monitor and
    improve our responses;
  - Provide customer service:
  - Facilitate communications generally in the context of our business activities;
  - Send administrative information to you, such as changes to our terms, conditions and policies.
- Analytics, Personalization, and Improvement. We use Personal Information for monitoring, testing, research, analysis, development and improvement of our Website and services.
- **Enforcing Our Terms**. We use Personal Information to enforce our leases, Terms of Use, and any other contractual terms and conditions that govern the relationship between you and Barrington Residential Inc.

- Security and Fraud Prevention. We use Personal Information to help maintain the safety, security, and integrity of our Website, services, databases and other technology assets, and business. We may also use such information if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Barrington Residential Inc., our affiliated entities, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- Law Enforcement. We use Personal Information to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations. We also use such information to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- **Business Transfers**. We may share Personal Information with another company to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our Website users and property rental customers is among the assets transferred.
- **Job Applicant Information**. We use job applicant information to make decisions about recruitment and employment.
- Other. We may ask if you would like us to share your Personal Information with other third parties who are not described in this privacy policy or as permitted by applicable law.

# 8. How We Share Your Personal Information

We do not sell Personal Information.

In addition to the specific situations already mentioned in this privacy policy, we disclose Personal Information in the following circumstances:

- Corporate Affiliates. We may share Personal Information with our corporate affiliates. Such corporate affiliates provide a service or property and process Personal Information in connection with the property or service that you have requested, or in other circumstances, with your consent or as permitted or required by law.
- Service Providers. We share certain Personal Information with third parties that perform services to support our core business functions and internal operations including: to our service provider, Entrata, Inc., for property management services including processing rental applications and background checks, facilitating rent payments and tenant communications. Entrata, Inc.'s privacy policy is available <a href="here">here</a>. We may also use service providers for such services as sending postal mail, e-mails, analyzing customer data, supporting beacons, investigating fraudulent activity, providing collections services where applicable and providing customer service.
- **SMS Programs**. We may receive consent for our SMS Programs from Entrata, Inc., if you have opted in. Information collected through our SMS Programs are not shared with third parties for marketing purposes.

- Legal Process. We may disclose Personal Information in response to subpoenas, warrants, court orders, government inquiries or investigations, or to comply with relevant laws and regulations. We may also disclose information to establish, exercise, or protect the rights of our Company, employees, agents, and affiliates; to defend against a legal claim; to protect the safety and security of our visitors; to detect and protect against fraud; and to take action regarding possible illegal activities or violations of our policies.
- **Business Transfers**. We may share Personal Information with another company that buys some, or all, of the assets or stock of Barrington Residential Inc. and/or any of its affiliates and that company may use and disclose Personal Information for purposes similar to what is described in this policy. Barrington Residential Inc. and/or its affiliates may also share Personal Information with prospective purchasers to evaluate the proposed transaction.

# 9. How We Protect your Personal Information

We have implemented safeguards designed to protect your Personal Information.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### 10. Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any Personal Information to or on the Website. We do not knowingly collect Personal Information from children under 16. If you are under 16, do not use or provide any information on this Website. If we learn we have collected or received Personal Information from a child under 16, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at feedback@barringtonresidential.com.

### 11. Accessing and Correcting Your Information

You can review and change your Personal Information by logging into the Website and visiting your account profile page.

You may also send us an email at feedback@barringtonresidential.com to correct any Personal Information that you have provided to us.

# 12. Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

# 13. Communicating With Us

To ask questions or comment about this privacy policy and our privacy practices, contact us at: feedback@barringtonresidential.com (866) 585-2787.