

WPM Real Estate Management Privacy Policy

This privacy policy (“Privacy Policy”) applies to the WPM LLC.com website operated by WPM Real Estate Management (“WPM”) and any website for a property that WPM Real Estate Management owns, operates, or manages (individually or collectively, the “Website”).

WPM recognizes the importance of protecting the privacy of individual-specific information collected from and about our Website users (referred to as “customers”, “you” or “your” in this Privacy Policy). WPM may collect a variety of personally identifiable information from customers, including information about customers and their spouses, domestic partners, dependents, family members and apartment occupants such as name, mailing address, email address, telephone number, Social Security/national insurance number, and other background information described in this document, depending on the specific service being provided (“Personal Information”). This Privacy Policy describes what Personal Information we gather and how we use it. In some instances, and in particular, if you are asked to submit registration details through the Website, you may be requested to agree to additional terms regarding our use of your Personal Information, and those additional terms will apply in that context. This Privacy Policy constitutes an integral part of our Website’s Terms of Use and is subject to the provisions thereof, including with respect to Limitation of Liability and governing law. We encourage you to read this Privacy Policy before you send or share Personal Information with us or use our Website and to read it again when you return to it.

You acknowledge that this Privacy Policy is part of the Website’s Terms of Use and by accessing or using the Website you agree to be bound by all of its terms and conditions. If you do not agree to these terms and conditions, please do not use the Website. We reserve the right to change this Privacy Policy at any time. Such changes, modifications, additions or deletions shall be effective immediately upon notice thereof. You acknowledge and agree that it is your responsibility to maintain a valid email address if you are a registered user and to review the Website and this Privacy Policy periodically and to be aware of any modifications. Your continued use of the Website after such modifications will constitute your: (a) acknowledgement of the modified Privacy Policy and (b) agreement to abide and be bound by the modified Privacy Policy.

WHAT PERSONAL INFORMATION DOES WPM COLLECT?

We collect Personal Information through the Website in order to provide you with information on the WPM experiences you have expressed an interest in, to provide you with information on other similar WPM experiences we believe will be of interest to you, and to better understand how we can help prospective clients, residents and employees. We also collect Personal Information for the purposes of administering certain services to residents and/or applicants, which may include, but not be limited to, services necessary or appropriate to complete any transaction, delivery, or provision of products and services, among other services that WPM may offer or provide from time-to-time (“Company Services”). Such personal information may include Personal Information. The type of Personal Information we collect will depend upon what we will need in order to provide you with the particular product or service that interests you. In the case of prospective residents and applicants for employment, the information requested on our registration form includes some or all of the following Personal Information: name and address, age or date of birth, email address, occupation, employment and income information, telephone number, educational background and Social Security/national insurance number, payment card information, and/or financial account information. Those interested in becoming residents may be asked to include, without limitation, the following further information: the kind of service you are requesting, the apartment size you are looking for, where you want to live, the type of building you prefer, your proposed rent budget, the number of individuals in your household and their ages, and whether or not you have pets.

If you become a resident of a residential community we manage, you may be asked to provide your credit card information in order to make payments for rent and other services. Since we provide these services through contractual arrangements with third-parties, we may need to release your personally identifiable information to these third parties. The use of your personally identifiable information by third-party service providers is governed by their privacy policies and terms of use.

For those interested in applying for employment at WPM, the following additional Personal Information may be requested or obtained: credit checks, background checks, reference checks and employment verification. Where required, we will obtain your consent before undertaking these checks. Once a candidate accepts a position, the candidate may be asked to complete additional information. This may include an invitation to self-identify ethnicity or race. This information is only collected for meeting government reporting requirements and the provision

of this information by candidates is voluntary. Our residential communities have their own separate websites and we use separate websites for the processing of rental applications and agreements and to assist our residents with other tasks which are required or helpful to them, such as paying rent online. The Privacy Policy set forth herein applies to the websites of our residential communities.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

THIRD-PARTY SITE LINKS

You should be aware that when you are on a Website, you could be directed to other third-party sites that are beyond our control. There are links to other non-WPM sites, which take you outside of our service. For example, if you “click” on a banner, an advertisement or a search result, the “click” may take you off of a Website. These other sites may include sites of other advertisers, sponsors and partners that may use their logo with ours as part of a co-branding agreement. These other sites may send their own cookies to visitors to collect data or solicit information. WPM does not control these sites and therefore is not responsible for their content or for their privacy policies. The inclusion of hyperlinks to any other sites on a Website does not imply any endorsement of the material on such sites, nor any association with their operators.

This Privacy Policy does not extend to anything that is inherent in the operation of the Internet, which is beyond our control. Remember that whenever you give out Personal Information online, it may be collected and used by people you do not know. If users have any questions about security, please contact us using the information in the “Contact Information” section.

EMAIL CONSENT AND OPT-OUT

Your provision of Personal Information through any of our registration forms on this site constitutes your affirmative consent that we may contact you by email or telephone to provide you with information and notices relating to the property where you reside, on various similar services available to you at or through that property and on various other properties that may be available and of interest to you in the future. It also means we may email you regarding updates to this Privacy Policy.

You may choose to opt out of receiving future commercial email messages from us as a result of your use of a Website. Please note that if you are a resident of a WPM community and you use both WPM LLC.com and your community's Website, you will need to opt-out of both Websites separately. You will also need to opt-out separately from any third-party sites you have registered with. Please see the section on Third-Party Site Links.

CHILDREN'S PRIVACY

We do not use the Websites to knowingly collect personal information from children under the age of thirteen (13) that requires parental notice and consent under the Children's Online Privacy Protection Act ("COPPA") without such parental consent. By using our Websites, you represent that you are not under 13 years of age. If you are a child under thirteen (13) years of age, you are not permitted to use the Websites and should not send any information about yourself to us through the site. In the event that we become aware that we have collected Personal Information from any child, we will dispose of that information, or otherwise treat it, in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under age 13 may have provided Personal Information through the Website, please contact us using the information in the "Contact Information" section.

INTERNATIONAL VISITORS

WPM is located in the United States (state of Maryland). If you are providing Personal Information and are not a resident of the United States, your country's laws governing data collection and use may differ from those in the United States, in particular, the U.S. may not provide the same level of protections as those in your own country. By providing information to WPM, you are transferring your personal data to the United States, and you consent to the transfer to, retention of and processing of your data in the United States.

CORRECTING AND DEACTIVATING PERSONAL INFORMATION

This section includes information about how all users may exercise their Privacy Rights. You have the right, freely and at reasonable intervals, to request that WPM inform you as to whether Personal Information relating to you is being processed. You have the right to request that WPM correct, supplement, delete or block your Personal Information in the event that the data are factually inaccurate, incomplete or irrelevant to the purposes of the processing activities or if the Personal Information is being processed in any other way which infringes

a legal provision. If you wish to exercise your rights or if you have any questions or suggestions regarding the use, collection, or security of your Personal Information, please contact us using the contact details in the “Contact Information” section.

When a request for user deletion is received, we will make all reasonable efforts to purge said data from our systems. Due to the nature of our service, some information may not be fully removed due to backups or archived copies; however, such information will only be used for the purpose of performing a contract that the user has entered into with us. We retain Personal Information for the duration of your relationships with us, and where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax or accounting requirements, to enforce our agreements or comply with our legal obligations). Retention periods may be extended if we are required to preserve your personal information because of litigation, investigations and other similar proceedings, or if a longer retention period is required or permitted by applicable law.

DATA SECURITY

While we take reasonable steps to secure your Personal Information, no data transmission over the Internet can be guaranteed to be completely secure. Likewise, no storage or processing of your Personal Information or other information on the site, or on other servers or databases to which the information may be transferred, can be guaranteed to be completely secure. Please consider this prior to submitting your Personal Information to us via the Website.

NOTIFICATION OF CHANGES

If we decide to change our Privacy Policy, we will advise users of those changes through a general description at the top of this Privacy Policy and may also post these details to other places we deem appropriate, so our users are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We may also email you.

CONTACT INFORMATION

If a user’s Personal Information changes (such as zip/postal code, phone, email or postal address), or if a user no longer desires to be registered with this site, we provide a way to correct, update or delete/deactivate users’ Personal Information. This can usually be done at the Registered User account settings

page or by mail at WPM, Attn.: Digital Marketing, 11433 Cronridge Drive, Owings Mills, Maryland 21117. If you contact us by mail, your communication should clearly be marked as a data protection query and as being time sensitive.

ACCEPTANCE OF THESE TERMS

By using this site, or providing information to us, you acknowledge your awareness of the terms of this Privacy Policy. If you do not agree with its terms or any amended terms that are made in accordance with this Privacy Policy, you are not authorized by WPM to use this Website.

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WEBSITE DISCLAIMER

The materials provided on this server are intended for informational purposes only and are not intended to constitute an offer or solicitation. Despite the efforts of WPM to provide accurate information, it is not possible to ensure that all information is constantly correct. The materials contained on this server could include technical inaccuracies or typographical errors. WPM assumes no responsibility for any actions taken as a result of using this server, or for errors or omissions in the materials on this server.