

Winchester Oaks 78 LLC, dba Winchester Oaks Apartments Privacy Policy

Last modified: June 25, 2025

This Privacy Policy (“Policy”) describes how Winchester Oaks 78 LLC (“Winchester Oaks,” “we,” “us,” “our”) collects, uses, and shares your personal information when you visit, communicate through, or complete a financial transaction on our property website (the “Site”).

Please read this Policy carefully to understand our practices regarding your information. By accessing or using the Site, you are indicating your consent to this Policy. If you do not agree to this Policy, you may not use or access our Site.

“Personal Information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. If you disclose any Personal Information relating to other people to us or to our service providers in connection with accessing our Site, you represent that you have the authority to do so. Personal Information does not include de-identified, aggregated or anonymized information that is maintained in a form that is not capable of being associated with or linked to you or publicly available information from government records. We may use de-identified, aggregated, or anonymized information for any lawful purpose and share it with any party.

PERSONAL INFORMATION WE COLLECT

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, device information, application usage data, information and IP addresses. We refer to this automatically collected information as “Device Information”.

We collect Device Information using the following technologies:

- “**Cookies**” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- “**Log files**” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “**Web beacons**,” “**tags**,” and “**pixels**” are electronic files used to record information about how you browse the Site.

We may collect some sensitive personal information such as social security and driver’s license numbers, county of citizenship, marital status, and criminal background through

the Site as a result of your rental application. It is optional for you to provide this information; however, failure to provide may mean we cannot consider your application. In collecting this information, we respect individual privacy, protect against unauthorized access to or use of information, and comply fully with all laws and government regulations in the collection, use, storage, display, distribution and disposal of such information. Additionally, when you submit a form on the Site, we collect certain information provided by you, including your first and last name, email address, employer, phone number (work), physical address (work), job title, as well as any additional information you supply. We refer to this information as “Form Information.”

Finally, when you make a payment on our Site, we may collect payment and billing information to process your transaction. We utilize third party payment providers to assist us in processing transactions.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We use the Form Information that we collect generally to:

- respond to correspondence placed through the Site;
- communicate with you; and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services; and
- collect and process rental applications and communicate with you regarding your application or account.

We use the Device Information that we collect to help us to improve and optimize our Site.

We use any payment information you provide to process your transactions and comply with legal and regulatory requirements.

SHARING YOUR PERSONAL INFORMATION

We disclose your Personal Information to our affiliates, including Cormorant Company, Inc., the property manager, and to other third parties in order to facilitate its use as outlined above. For instance, we utilize Entrata to manage our website and to facilitate communication with our end users—you can find more details regarding Entrata's handling of your Personal Information here: [Entrata Terms of Use](#).

We may disclose Personal Information that we collect or you provide to a buyer or other successor in the event of 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 Site users is among the assets transferred.

Furthermore, we share your Personal Information with employees, contractors, service providers, and other parties essential for supporting the Site and our business operations.

In addition, where consistent with applicable laws and regulations, we may disclose Personal Information in all categories above:

- To prepare, negotiate, or perform a contract or transaction with you;
- To respond to subpoenas, court orders, or other legal process or otherwise as required by law or the competent government or judicial authorities;
- To establish or preserve a legal claim or defense;
- As part of a company restructuring, sale of assets, merger, or divestiture; or
- To prevent fraud or other illegal activities, such as willful attacks on our information technology systems.

DATA SECURITY AND RETENTION

We seek to use commercially reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact Us" section below.

We will only retain your information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for your information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of your information, the purposes for which we process your information and whether we can achieve those purposes through other means, and the applicable legal requirements.

THIRD-PARTY LINKS & COOKIES

Our Site may contain links to other websites or may be linked from other websites or social media platforms. We may also partner with third parties that may use technologies such as cookies, widgets, and links to gather information about users on our Site. We do not have control over third party websites or social media platforms, and any third party website's privacy practices are not governed by this Policy. Any time you leave our Site to a third party website or social media platform or interact with a third party link or other technology, you should exercise caution and review the privacy statement applicable to such websites to learn more.

CHILDREN UNDER THE AGE OF 16

We do not knowingly collect Personal Information from children under the age of sixteen (16) without authorization by a holder of parental responsibility. If you believe we may have collected information from or about a child under the age of 16, please contact us at info@cormorantco.com.

DO NOT TRACK

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

DATA ACCESS RIGHTS

To the extent applicable law provides you with the right to review, correct, update, or delete Personal Information that you previously have provided to us, please contact us using our contact information below should you wish to do so. We will respond to your request consistent with applicable law.

CHANGES

We reserve the right to make any changes, modifications, additions, or deletions to this Policy at any time. If we make material changes to privacy practices, we will notify you by email or through a notice on this page. We encourage you to check this page regularly for updates.

CONTACT US

For more information about our privacy practices, if you have any questions, or if you would like to file a complaint, please contact us by e-mail at info@cormorantco.com or by mail at the address listed below.

Address: 6960 Orchard Lake Road
Suite 206
West Bloomfield, MI 48322