

## **PRIVACY POLICY**

### **PLEASE READ THIS PRIVACY POLICY CAREFULLY**

#### **Privacy Statement**

The Trillist Companies, Inc. (together with its divisions, affiliates, subsidiaries and related companies, collectively, "Trillist") has created this privacy policy (this "Privacy Policy") in order to demonstrate our commitment to consumer privacy. In this Privacy Policy, references to "we," "our" or "us" refers to Trillist, any person or entity responsible for operating any property owned, operated and/or managed by Trillist, whether directly or through our affiliates, subsidiaries, and divisions, and any third party with which we contract for the purposes of providing services to Trillist or to you in connection with this website (this "Site"). We recognize the importance of protecting the privacy of personal and financial information you may provide us through this Site or through other means. When you access this Site, opt to fill out an information submission form, or otherwise provide us with information about you, you give us your consent to process and use such submitted information in accordance with the terms and conditions of this Privacy Policy. The following describes Trillist's information gathering and dissemination practices related to this Site, including those associated with specific Trillist communities.

By accessing or otherwise using this Site, you agree to be bound contractually by this Privacy Policy. The effective date of this Privacy Policy is October 1, 2018.

#### **Modification of Privacy Policy**

We reserve the right to modify this Privacy Policy at any time by posting amended terms on this Site. Your continued use of this Site after such notice indicates your acceptance of the amended Privacy Policy. You should check this Privacy Policy periodically for modifications by referencing the effective date posted above.

#### **Collection of Personal Information**

Trillist collects information about you when you provide information to us through this Site. This may include, but is not limited to, those forms requesting information about us or any of our communities, or requests for someone from our team to contact you. Information you may provide through this Site may include your name, email address, phone number, home address, contact preferences, credit history and other financial information.

We also provide residents within our communities with access to a variety of services, resources and functions to help facilitate and enhance their lives. You may access some of these services, resources and functions through this Site, including, from time to time: (1) building and management announcements, (2) package delivery notifications and in-home package and dry-cleaning delivery, (3) service request tracking, (4) payment features that allow our residents to view and pay for open charges via automatic bank withdrawal, (5) building amenity and resource information, (6) concierge services and our amenity services, (7) information on technology options in the building, (8) offers from

our partners, (9) online profile management, (10) a feedback area, (11) building contact information and forms, (12) postings of resident documents, and (13) signature resident services through our The Art of Living<sup>®</sup> program (collectively, the “Services”).

We may, from time to time, contract with third parties to manage all, or any portion of, the Services. We may share personal information collected through this Site with such third parties in order to facilitate the provision of Services you request, but such information sharing will be limited to that which is reasonable to assist in providing you with the Services you have requested.

If you choose to pay your rent or other expenses via this Site, you will be required to provide us with your credit card and billing information as part of the transaction or means to consummate auto-draft withdrawals from your bank accounts.

#### Use and Disclosure of Personal Information

We use the information you provide to us through this Site to send you information about us and our communities, as well as to contact you when necessary. You may opt-out of receiving future mailings or emails in accordance with the “*Opt-Out*” section below. We may share your personal information with our affiliates and subsidiaries in accordance with this Privacy Policy. Otherwise, we may share your personal information only under the following circumstances:

- **Agents**. We employ other companies and individuals (collectively, “Agents”) to perform functions on our behalf (e.g., creating and maintaining the Site, sending postal mail and email, removing repetitive information from customer lists, analyzing data, performing credit and criminal history background checks, providing marketing assistance and providing customer service). Our Agents will have access to personally identifiable information solely to perform their functions and provide their services to us, and for no other purpose.
- **Licensees**. Each community displayed on this Site has been developed by, and is owned and/or operated by, an affiliate of Trillist through a separate, single purpose entity that is solely responsible for its development, operations, obligations and liabilities. Each such entity is a licensee of Trillist, pursuant to a license and marketing agreement between Trillist and each applicable entity. We may share your personal information with a Licensee responsible for the operations of your community to the extent necessary to assist such Licensee in fulfilling its obligations to you or to Trillist.
- **Business Transfers**. As we continue to develop our business, we may sell or buy assets. In such transactions, customer information generally is one of the transferred business assets. Thus, if we or a subsidiary we control, sells substantially all of its assets, or is acquired by another entity, customer information may be one of the transferred assets. If such a transaction were to occur, you consent to a transfer of your personal information.

- **Protection of Trillist and Others.** Trillist releases personal information when such release is necessary to comply with applicable law; enforce or apply our Terms of Use (which is also available for your viewing on this Site) or other agreements; protect the rights, property, or safety of Trillist and our users; or in connection with a legal claim or proceeding. This includes, without limitation, exchanging information with other companies and organizations as part of our efforts to prevent fraud and identity theft.

#### **Collection, Use, and Disclosure of Non-Personal Information**

The term **“Non-Personal Information,”** as used in this Privacy Policy, contains nothing that could identify you personally. We may collect such Non-Personal Information, such as demographic and profile data, through this Site or by your access to another website linked to this Site. We may aggregate Non-Personal Information and share it with our affiliated companies and other third parties.

#### **Security**

We use physical, technical and administrative safeguards to protect the information you provide to us. However, while we use commercially reasonable steps to protect the personal information you provide to us from unauthorized access, use or disclosure, you accept that no data security safeguards are invulnerable to access by unauthorized persons.

#### **Opt-Out**

In order to opt-out of future emails on a given topic, you should click on the UNSUBSCRIBE link that is available at the bottom of each email message. This will halt future communications for that specific function. We will process your opt-out request promptly, but it may take up to three weeks for the request to be processed through our systems and you may receive communications from us during that period. To re-subscribe, you may return to the relevant Site and resubmit the request form.

#### **IP Address**

We may use your Internet Protocol (IP) address to help diagnose problems with our server, as well as to administer this Site. Your IP address may be used to help identify you and to gather broad demographic information. We may use your IP address to help protect ourselves and our partners from fraud. For system administration purposes, we also log IP server addresses and catalogue traffic patterns through this Site. However, we do not link this information to users’ personal information.

## **Cookies**

Cookies are pieces of data assigned by a web server that uniquely identify the browser on your computer. This Site typically uses temporary cookies called “session” cookies to ensure that you are recognized when you move from page to page within one site and that any information you have entered is remembered. For example, if an e-commerce site did not use session cookies then items placed in a shopping basket would disappear by the time you reach the checkout. This Site also uses cookies called “persistent” cookies to enable the Site to remember you on subsequent visits, speeding up or enhancing your experience of services or functions offered. We may set and access both persistent and session cookies on your computer. You have the option to accept or disable cookies at any time through your Web browser. Visit the “help” portion of your toolbar for more information. Your decision to accept or reject a cookie from this Site will not affect your ability to access this Site; however, this Site may not function as intended if a cookie is rejected. This Site’s cookies are not linked to any personally identifiable information.

## **Links**

This Site may contain links to Websites that are operated or owned by third parties. Please note that when you click on one of these links, you are navigating to another site. We encourage you to read the privacy statements of these linked sites, as their privacy policies may differ from ours. We are not responsible or liable for the privacy practices or the content of these third-party sites, and you use them at your own risk.

## **Minors**

This Site is directed toward and designed for use by persons aged 18 or older or the age of majority in the jurisdiction in which you reside. We will not approve applications of, or establish or maintain accounts or memberships for, any individual that we know to be under the age of 18. We do not solicit or knowingly collect personally identifiable information from individuals under the age of 18. If we nevertheless discover that we have received personally identifiable information from an individual who indicates that he or she is, or that we otherwise have reason to believe is, under the age of 18, we will delete such information from our systems. Additionally, a child’s parent or legal guardian may request that the child’s information be corrected or deleted from our files by contacting us at the web address set forth below.

## **Contacting Us**

If you have any questions about this Privacy Policy, the practices of this Site, or the information you have submitted to us, you can contact us at: [webinfo@wheredoyolive.com](mailto:webinfo@wheredoyolive.com).