

**This Privacy Policy is effective as of [5/1/2020] and was last reviewed on 5/1/2020 .**

This Privacy Policy applies to all the websites managed by Perimeter Realty, Inc. (collectively, the "Site") operated by Fort Family Investments/Perimeter Realty Inc., and its subsidiaries for the properties (referred to herein as Fort Family, "we", "us", or "our"), and applies to information, products, and services provided by Fort Family in Florida. This Privacy Policy does not change or alter any separate written agreements with Fort Family Investments/Perimeter Realty, Inc. While we provide this Privacy Policy to employees, job applicants, contractors, or similar individuals to the extent such individuals use our Site, this Privacy Policy is not a full description of our policies for and may not apply to such individuals. Please contact us using the information in the "Contact Information" section below if you have questions.

Fort Family 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). Fort Family 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," as it is used in this policy, includes information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device. 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 this Site, 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 Site 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 Site and to read it again when you return to it.

You acknowledge that this Privacy Policy is part of the FortFamilyInv.com and all websites associated website's Terms of Use and by accessing or using this Site 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 this Site(s). We reserve the right to change this Privacy Policy at any time. Such changes, modification, 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, review this Site and this Privacy Policy periodically and to be aware of any modifications. Your continued use of this Site 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 FORT FAMILY COLLECT?**

We collect Personal Information from our Site in order to provide you with information on the Fort Family experiences in which you have expressed an interest, to provide you with information on other similar Fort Family 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 Fort Family may offer or provide from time-to-time (“Company Services”). 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 information, telephone number, educational background and Social Security/national insurance number, payment card information, and/or financial account information.

Within the past twelve months, we have collected the following categories of Personal Information from consumers:

- A. Identifiers (*e.g.*, name, address, email address, Social Security number);
  - B. Protected legal classification characteristics (*e.g.*, age, race, sex, citizenship, marital status);
  - C. Commercial information (*e.g.*, products or services purchased, purchasing history);
  - D. Internet activity (*e.g.*, browsing history, interaction with website);
  - E. Geolocation data (*e.g.*, physical location or movements);
  - F. Sensory data (*e.g.*, audio, electronic, visual, thermal, olfactory or similar information); and
- A. Employment information; Education information; and Inferences about personal preferences (*i.e.*, cookies).

If you become a resident of a residential community we manage, you may be asked to provide your debit or 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. Please note that this Privacy Policy does not govern the practices of third parties. The use of your personally identifiable information by third parties service providers is governed by their privacy policies and terms of use.

For those interested in applying for employment at Fort Family, 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 provide additional information. Such additional information 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 sites and we use separate sites for the processing of rental applications and agreements and to assist our residents with other tasks that are required or may be helpful to them, such as paying rent online. You will move away from this Site when engaging in those activities. The Privacy Policy set forth herein also applies to the websites of our residential communities.

## WHAT KINDS OF SOURCES DO WE COLLECT THIS INFORMATION FROM?

1. Personal Information may be obtained directly from you; for example, when you use certain services on our website, communicate with us, request services, apply for an apartment or employment, make payments through a website or submit a request for information.
2. Personal Information also may be collected directly and indirectly from activity on our website, through the use of IP addresses and “cookies.”

An IP address is a number that is automatically assigned to your computer whenever you are connected to the Internet. Web servers, the main computers that serve web pages, automatically identify your computer by its IP address. As permitted under applicable law, Fort Family collects IP addresses for the purposes of system administration, gathering and analyzing aggregated information, creating a better experience for users, and auditing the use of our Site.

“Cookies” are pieces of information that a website transfers to an individual for recordkeeping purposes. Cookies make web surfing easier for you by saving your preferences while you are using our Site. The use of cookies is an industry standard, and as such, you will find them at most major websites. By showing how and when users use a site, cookies help us see which areas are popular and which are not. Many improvements and updates to the Site are based on such data, including total number of visitors and pages viewed. This information is most easily tracked with cookies. We use the information from cookies only to provide services better tailored to your needs and for the protection of our website and users from potential harm. We never save passwords or debit or credit card information in cookies.

We use persistent session and third party tracking cookies on our Site, which are cookies that stay in your web browser between visits. We use these to capture analytical information about our visitors that helps us improve the performance of our Site and create a better experience. These cookies allow us to recognize and count the number of visitors, to provide content related to a prior visit to the Site, and to see how visitors move around the Site and the products and services in which they are interested when they are using it. This information helps us to improve the way our Site works by making sure users are finding what they need more easily.

Most browsers are set up to accept cookies. If you want to change your cookie preferences, you can do so through your browser settings or refuse the cookies when you enter the Site. Please remember that our cookies are often used to give you certain functionality and without them you may not be able to use some portions of our Site (*e.g.*, save properties from our listings). You can also remove cookies that already have been set in your browser via your browser settings.

3. Personal information may also be collected from third parties that interact with us in connection with the services we perform. For example, if you apply to rent an apartment, we may obtain information from third parties about your creditworthiness; if you apply for a job, we may obtain information from third parties about your employment or education history.
4. We also may collect personal information from other sources, including public data bases, joint marketing partners, and social network information. If you use a social network login

to access our services, we may collect certain information from your social media account such as your name, email address, photo, list of social media contacts, and any other information that may be made accessible to us when you connect via your social media account.

## **HOW DO WE USE THE INFORMATION WE COLLECT?**

Fort Family may use, or disclose any of the categories of Personal Information we collect from you for one or more of the business purposes as described below.

1. To fulfill or meet the reason for which the information was provided, to respond to your questions or other requests, to purchase a product or service, to process payment or facilitate delivery of goods or services;
2. To provide you with services or process transactions that you have requested;
3. To provide you with information, products or services that you request from us;
4. To provide you with email alerts and other notices concerning things that may be of interest to you;
5. To process applications, payments, or changes to your account information;
6. To evaluate your application for employment;
7. To verify information you have provided to us;
8. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing;
9. To support, personalize and develop our websites, products and services;
10. To create, maintain, customize and secure your account with us;
11. As necessary to protect the rights, property or safety of us, our clients or others;
12. To protect against, identify and prevent fraud and other unlawful activity; and
13. As required by applicable law.

We will not collect additional categories of Personal Information or use the Personal Information we collect for materially different or incompatible purposes.

## **WHAT INFORMATION DO WE SHARE OR DISCLOSE?**

We do not share your Personal Information with third parties, unless:

- Such information is shared and/or commercialized following receipt of a specific request and/or permission from users;

- Such information is shared with affiliated companies and/or potential investors (in any form of business transaction, including purchase or merger);
- Such information is shared with vendors and service providers that may from time to time be selected or utilized by Fort Family, its agents, or the owners of residential communities we manage, for the purposes of administering or carrying out management responsibilities and business objectives for the community, such as third parties that process payments, assist with utility billing, provide collection services, etc.
- Such information is shared in order to comply with or in accordance with any applicable law and/or court orders and/or in order to prevent suspected illegal acts, frauds, or situations involving potential threats to the safety of any person, or as otherwise required by law. This circumstance includes responding to lawful requests by public authorities, including national security or law enforcement entities;
- Such information is shared in order to help Fort Family defend against claims and/or establish or exercise any legal right that Fort Family may have;
- Such information is shared in order to help Fort Family prevent violations of the Fort Family Terms of Use and this Privacy Policy or otherwise to protect the rights, property, or safety of Fort Family Investments/Perimeter Realty, Inc. employees, residents and other persons, including exchanging information with third parties for fraud protection and credit risk reduction, in accordance with applicable laws.

## **WHAT CATEGORIES OF MY INFORMATION WILL BE SOLD TO OTHER PARTIES?**

Fort Family uses personal information we collect from you to fulfill or meet the reason for which the information was provided, to respond to your questions or other requests, to purchase a product or service, to process payment or facilitate delivery of goods or services:

- Marketing partners
- Advertisers
- Affiliates, parents or subsidiary organizations and
- Data analytic providers

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is at least 13 but not yet 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by contacting us via our website with your information and indicated that you do not want your information to be sold.

### **THIRD-PARTY SITE LINKS**

You should be aware that when you are on the Fort Family website you could be directed to other third party sites that are beyond our control. There are links to other sites from Fort Family, which take you outside our service. These other sites may send their own cookies to visitors to collect data or solicit information. Fort Family does not control these sites and therefore is not responsible for their content. The inclusion of hyperlinks to any other sites by Fort Family does not imply any endorsement of the material on such sites, nor any association with their operators.

Fort Family policies do not extend to anything that is inherent in the operation of the Internet, which is beyond our control. Remember that whenever you give out information online, that information may be collected and used by people you do not know. If users have any questions about security, please contact us.

### **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 to provide you with information and notices relating to the property where you reside regarding 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. Please note that if you are a resident of a Fort Family community and you use this Site and your community site, you will need to opt-out of your community site separately. For Fort Family residents, the opt-out function does not apply to Emergency Notifications. In addition, you also will need to opt-out separately from any third party sites with which you have registered.

### **CHILDREN'S PRIVACY**

We do not 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 Site, 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 Site 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 personally identifiable information through the Site, please contact us using the information in the "Contact Information" section.

## **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 Fort Family inform you as to whether Personal Information relating to you is being processed. You have the right to request that Fort Family 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.

## **NOTICE TO RESIDENTS IN THE EUROPEAN UNION**

Fort Family provides services exclusively within the United States and does not own or manage properties outside the United States. Fort Family does not intentionally market its products and/or services outside the United States, or have a presence outside the United States, including in the European Union ("EU"), any EU-member state, or any state belonging to the European Economic Area ("EEA"). If you choose to use our website and/or services from the EU, EEA, or other regions of the world, you acknowledge that we will transfer your Personal Information to the United States. Do not provide your Personal Information to us if you do not want this information transferred outside your country, or if the laws in your country restrict these types of transfers.

In addition, you will be entitled to certain rights with respect to the Personal Information that we collect about you:

1. Right to be informed. The right to know how your Personal Information will be used;
2. Right of access and portability. The right to obtain access to your Personal Information, along with certain related information, and to receive that information in a commonly used format and to have it transferred to another data controller;
3. Right to rectification. The right to obtain rectification of your Personal Information without undue delay where that Personal Information is inaccurate or incomplete;
4. Right to erasure. The right to obtain the erasure of your Personal Information without undue delay in certain circumstances, such as where the Personal Information is no longer necessary in relation to the purposes for which it was collected or processed;

5. Right to restriction. The right to obtain the restriction of the processing undertaken by us on your Personal Information in certain circumstances, such as where the accuracy of the Personal Information is contested by you, for a period enabling us to verify the accuracy of that information; and
6. Right to object. The right to object, on grounds relating to your particular situation, to the processing of your Personal Information, and to object to processing of your Personal Information for direct marketing purposes, to the extent it is related to such direct marketing.

## **DATA SECURITY**

Fort Family takes reasonable technical and organizational measures in accordance with applicable laws to secure your Personal Information; however, 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. You therefore disclose such Personal Information at your own risk. Please consider this limitation prior to submitting your Personal Information to us via the Site.

We limit access to Personal Information to employees who we reasonably believe need to receive such information to provide our services and/or perform their job duties, and we ensure that our employees are aware of the need to protect the Personal Information submitted to us through training and internal data protection policies.

## **NOTIFICATION OF CHANGES**

We may make changes to this Privacy Policy from time to time, to reflect changes in our practices and as required to comply with changes in applicable laws or regulatory requirements. 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. Your continued use of our Site following the posting or other notification of changes constitutes your acceptance of such changes.

## **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 are not happy with its terms or any amended terms that are made in accordance with this Privacy Policy, you are not authorized by Fort Family to use this Site.

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