

Information Collection

If you elect to pay rent online, we may collect credit card and/or bank information to process payments. You will be required to provide social security number, date of birth and other similar personally identifiable information through our online lease application form.

Children's Privacy

Neither our Site nor our services are intended for children under the age of 16. [CLIENT] does not target its services or this Site to children under 16. [CLIENT] does not knowingly collect personally identifiable information from children under the age of 16.

Third Party Analytic Tool

On Carlo Site

Users may learn more about Google's use of cookies by visiting the Google Privacy and Terms page at <http://www.google.com/policies/>.

Usage Information

We automatically collect information about your interactions with the Site, including information about the device you use to interact with and/or access the Site, such as: IP address, access dates and times, information about your approximate location (as determined through your IP address), hardware and software information, mobile, computer or hardware device information (e.g., operating system version, Hardware model, IMEI number and other unique device identifiers, MAC address, and device settings), device event information, and crash data. This information allows [CLIENT] to understand how you've used the Site (which may include administrative and support communications with us or whether you have clicked on links to External Web Sites), and other actions you have taken in connection with your use of the Site. We automatically collect log data when you access and use the Site, even if you have not created an account or logged in.

Disclosure of Personally Identifiable Information

We may provide your personally identifiable information and the data generated by cookies and third-party analytics tools (i.e., Google Analytics and Google Ads)

Privacy Notice for California Residents

This section supplements the information provided in the Privacy Policy above and applies only to visitors and users who are residents of the state of California. If you have questions or concerns about any of the information provided in this Privacy Notice for California Residents, please contact us using the information provided in the "Contact Us" section of this Privacy Policy below.

Personal Information We Collect

For purposes of this section "personal information" means information that identifies, relates to,

describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include:

- information that is lawfully made available from federal, state, or local government records;
 - de-identified or aggregated information; and
 - information excluded from the scope of the California Consumer Privacy Act of 2018 (“CCPA”)
 - such as health or medical information covered under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and financial information covered under the Fair Credit Reporting Act (“FCRA”) or Gramm-Leach Bliley Act (“GLBA”).
- In the last twelve (12) months, we have collected the categories of personal information described in the table below

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Category	Examples	Collected
1. Identifiers	Real name (such as first name and last name); alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers	Yes
2. Customer Records Information	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any Yes other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
3. Characteristics of protected classifications under California or federal law	Age (forty (40) years or older)	Yes

4. Commercial information	Records of products or services purchased, personal property, or other purchasing or consuming histories or tendencies.	No
5. Biometric information	Fingerprints, facial or hand imagery, voice recordings from which an identifier template can be extracted, keystroke patterns, gait patterns, sleep, health, or exercise data.	Yes
6. Internet or other similar network activity information	Browsing history, search history, information regarding consumer's interaction with a website, application, or advertisement.	Yes
7. Geolocation data	GPS coordinates or other location tracking information.	Yes
8. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
9. Professional or employment-related information	Employer, employment history, background checks, and other employment-related information.	Yes
10. Education information	Records maintained by an educational agency or institution that pertain to a student, such as grades and transcripts	No
11. Inferences	Inferences drawn from any of the categories described above to create a profile about a consumer reflecting the consumer's preferences, Yes characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

The table below describes the sources for each category of personal information we collect, the business and/or commercial purposes for which we use each category of personal information, and the third parties with whom we share each category of personal information we collect.

Category	Sources	Business or Commercial Purposes	Third Parties Shared With
1. Identifiers	<ul style="list-style-type: none"> ● Directly from consumers ● Website cookies ● Website analytics 	<ul style="list-style-type: none"> ● To fulfill specific consumer requests ● To enhance the website experience 	<ul style="list-style-type: none"> ● Website providers ● Analytics providers ● Advertising providers

	providers	<ul style="list-style-type: none"> ● For marketing purposes 	<ul style="list-style-type: none"> ● Telephone service providers <p>Sale: Not Sold</p>
2. Customer Records Information	<ul style="list-style-type: none"> ● Directly from consumers ● Website cookies ● Website analytics providers ● Background Checks 	<ul style="list-style-type: none"> ● To fulfill specific consumer requests ● To complete Lease Application and Lease Agreement ● To complete online payment function through website 	<ul style="list-style-type: none"> ● Property Management staff ● Third party payment processor ● Website providers <p>Sale: Not Sold</p>
3. Characteristics of protected classifications under California or federal law	<ul style="list-style-type: none"> ● Directly from consumers 	<ul style="list-style-type: none"> ● To Complete Lease application and perform background check 	<ul style="list-style-type: none"> ● Property Management staff ● Third party Background check provider <p>Sale: Not Sold</p>
4. Commercial information	N/A	N/A	N/A
5. Biometric information	<ul style="list-style-type: none"> ● Telephone calls 	<ul style="list-style-type: none"> ● To fulfill your requests ● For internal training ● For marketing ● For analysis 	<ul style="list-style-type: none"> ● Telephone service providers ● Analytics providers <p>Sale: Not Sold</p>
6. Internet or other similar network activity information	<ul style="list-style-type: none"> ● Website cookies ● Website analytics providers 	<ul style="list-style-type: none"> ● To enhance the website experience ● For marketing purposes 	<ul style="list-style-type: none"> ● Website providers ● Advertising providers <p>Sale: Not Sold</p>
7. Geolocation data	<ul style="list-style-type: none"> ● Directly from consumers ● Website Cookies ● Website analytics providers ● Advertising providers 	<ul style="list-style-type: none"> ● To analyze website traffic ● For marketing purposes 	<ul style="list-style-type: none"> ● Website providers ● Analytics Providers ● Advertising providers <p>Sale: Not Sold</p>
8. Sensory data	<ul style="list-style-type: none"> ● Telephone calls 	<ul style="list-style-type: none"> ● To fulfill your requests ● For internal training ● For marketing ● For analysis 	<ul style="list-style-type: none"> ● Telephone service providers ● Analytics providers

			Sale: Not Sold
9. Professional or employment-related information	<ul style="list-style-type: none"> • Directly from consumer • Background check provider 	<ul style="list-style-type: none"> • Income verification • Background check 	<ul style="list-style-type: none"> • Third party background check provider Sale: Not Sold
10. Education information	N/A	N/A	N/A
11. Inferences	<ul style="list-style-type: none"> ● Website analytics providers ● Advertising providers 	<ul style="list-style-type: none"> ● For marketing purposes 	<ul style="list-style-type: none"> ● Analytics Providers ● Advertising providers Sale: Not Sold

Personal Information We Disclose

- *Sale of Personal Information*

We do not sell personal information.

- *Disclosure of Personal Information for Business Purposes*

We disclose the following categories of personal information for business purposes: identifiers, biometric information, internet or other similar network activity information, geolocation data, and inferences.

We do not sell personal information of minors under the age of sixteen (16) years of age without affirmative authorization.

Your Rights

If you are a resident of the state(s) identified above, you have specific rights regarding your personal information. This section describes your rights and how to exercise them.

- *Right to Know About Personal Information Collected, Disclosed, or Sold*

You have the right to request that [CLIENT] disclose to you what personal information we collect, use, disclose, and sell. You may exercise this right following the methods described under the subsection titled "Exercising Your Rights" below.

- *Right to Delete Personal Information*

You have the right to request that [CLIENT] delete personal information we may hold about you. You may exercise this right following the methods described under the subsection titled "Exercising Your Rights" below. Please be aware that we may not always be able to delete your personal information. For example, there may be business or operational reasons why we need to retain personal information. If we deny your request to delete personal information, we will

inform you of the basis for our denial in our response to you.

c. Right to Opt-Out of Sale of Personal Information

You have the right to opt out of the sale of your personal information. Because we do not sell personal information, this right does not apply to [CLIENT].

d. Right to Non-Discrimination

You have the right to not receive discriminatory treatment from [CLIENT] for exercising any of your rights described under this “Your Rights” section. This means we will not treat you differently for exercising any of the rights described above.

Exercising Your Rights

You may exercise each right once every twelve (12) months. To exercise your rights, you must submit a verifiable request to us. To submit a verifiable request, please follow the methods described below: You are invited to utilize the Contact Us web form or call the number listed below to exercise your rights in this section. Link to web form is below:

<https://www.carloinc.net/contact-us>
[818.989.6200](tel:818.989.6200)

To verify your request, we will [independently verify your ID by requesting certain personally identifiable from you.

You may designate an authorized agent to submit a request on your behalf. To designate an authorized agent, you must submit a signed authorization form in order for us to process a request from a third party.

We will respond to your rights request within ten (10) days from the date we receive it. In some cases, we may require additional time to complete your request and will inform you if additional time is needed. Where additional time is needed, we may take up to a maximum of ninety (90) additional days to complete your request.

Financial Incentives

[CLIENT] does not offer financial incentives or price or service differences in exchange for the retention or sale of personal information.