

Redwood Communities, Inc. Privacy Policy

This Privacy Policy was last updated: November 22, 2022

Thank you for visiting Redwood Communities, Inc.'s ("Redwood Communities", "we", "us" or "our") Internet web site ("Site") located at the URL www.redwoodhousing.com. This Privacy Policy details certain policies implemented throughout Redwood Communities governing our collection, use and transfer of personally identifiable information ("Personal Information") about users of the Site and other services provided by us or our affiliates.

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1. Privacy Policy Updates

Redwood Communities may need to update this Privacy Policy from time to time. If so, we will post the updated Privacy Policy on the Site along with a change notice on the Site. Redwood Communities may also send registered users of our services a notice that this Privacy Policy has been changed. We encourage you to review this Privacy Policy regularly for any changes. Your

continued use of this Site and/or services and/or your continued provision of Personal Information to us after the posting of such notice will be subject to the terms of the then-current Privacy Policy.

2. Information Collection

In certain sections of this Site, we may require you to submit your Personal Information to us, and we may invite you to submit questions, comments and request information. In addition to any Personal Information that you may voluntarily provide, the Site collects information using cookies and other third-party tools. Please refer to the sections below on “Cookies” and “Third Party Analytics Tools” and “Third Party Advertising Tools” for more information about the information these tools collect and use.

Due to the nature of some of our services, you may provide us with Personal Information such as your name, email address, username, password, address, phone number, and other contact information that you voluntarily transmit with your communication to us.

We may combine the Personal Information that we have collected about you with other information about you obtained from other sources (both online and offline), such as from third parties and public sources. If you provide us, our service providers, or our affiliates with any Personal Information relating to other individuals, you represent that you have the authority to do so, and where required, have obtained the necessary consent, and acknowledge that such Personal Information may be used in accordance with this Privacy Policy.

3. Information Use

We may use your Personal Information to deliver our services or information you have requested, verify your authority to enter certain password protected areas of the Site, verify that you are a customer or prospective customer, send you information that you have signed up to receive, notices about our products and/or services that you have used or that may be of interest to you and notices about events, and improve the content and general administration of the Site and our services. There may be other uses, which we would describe to you when we collect the information.

If you are a user of our services, we may use your Personal Information to provide the services to you.

We may use your Personal Information when we have your consent to do so, where required or permitted under applicable law. If we are using your Personal Information on the basis of consent, you may withdraw your consent at any time (which will not affect the lawfulness of the processing before consent was withdrawn) by emailing us at privacy@redwoodhousing.com.

We may use your Personal Information to comply with legal obligations or legal processes, respond to requests from government and other public authorities, and to pursue available remedies or limit damages we or third parties may sustain.

4. Children's Privacy

Redwood Communities recognizes the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. Neither the Site nor our services are intended for children under the age of 16. Redwood Communities does not target its services or this Site to children under 16. Redwood Communities does not knowingly collect personally identifiable information from children under the age of 16. By accessing our Site or initiating any communication with us, you represent that you are at least 16 years old.

5. Cookies

We may use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

On the Site, we may use session cookies to make it easier for you to navigate the Site by remembering your locale preferences and to improve and track the overall Site experience. For the Site, we may set a persistent cookie to authenticate your login and authorization to use the services. Persistent cookies enable us to track, store and target the interests of our users to enhance the experience on the Site. If you reject cookies, you may still use the Site, but your ability to use some areas of the Site may be limited.

6. Third Party Analytics Tools

Beyond the personally identifiable information you voluntarily provide to us directly, Redwood Communities utilizes analytics tools including third party technologies, such as Google Analytics, to collect information utilizing cookies. Certain types of information, including geolocation, device type, onsite website usage and behavior, demographic data, and purchase history, is collected and aggregated across Redwood Communities Site users for our analysis and advertising efforts.

7. 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 Redwood Communities 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.

8. Aggregate Information

We may collect and track the total number of visitors to the Site, the number of visitors to each page of the Site, External Web Sites (defined below) linked to and other aggregated data collected through our services and we may analyze this data for trends and statistics in the aggregate but such information will be maintained, used and disclosed in aggregate form only and it will not contain personally identifiable information. We may use such information for purposes such as analyzing trends, administering the Site, and to understand how users interact with the Site.

9. Disclosure of Personally Identifiable Information

In general, we may share and/or transfer your Personal Information to affiliates, agents, vendors or service providers who assist us in the process of providing products or services to you, or otherwise perform functions on our behalf. Third party service providers may use Personal Information we provide to them only as instructed by us. We may provide your Personal Information and the data generated by cookies and third party analytics tools and the aggregate information to the vendors and service agencies that we may engage to assist us in providing our services to you. For example, we engage with G5 Search Marketing, Inc. to assist us in creating and hosting this Site.

We reserve the right to disclose Personal Information to third parties where we believe in good faith that disclosure is required to comply with our legal obligations under applicable laws, to cooperate with regulators or law enforcement authorities, to comply with a judicial proceeding or legal process, to enforce our terms of use, or to protect the safety, rights, or property of our users, the public, or Redwood Communities. In addition, we may disclose information about you to a third party at your request, or if you consent to the disclosure.

We will not sell your Personal Information to any company or organization except we may transfer your Personal Information to a successor entity upon a merger, consolidation or other corporate reorganization in which Redwood Communities participates or to a purchaser of all or substantially all of Redwood Communities' assets to which this Site relates.

10. Links to Third Party Sites

The Site may provide links to other Web sites or resources over which Redwood Communities does not have control ("External Web Sites"). Such links do not constitute an endorsement by Redwood Communities of those External Web Sites. You acknowledge that Redwood Communities is providing these links to you only as a convenience, and further agree that Redwood Communities is not responsible for the content of, or for the protection of any information provided while visiting, such External Web Sites. Your use of External Web Sites is subject to the terms of use and privacy policies located on the linked to External Web Sites.

11. Data Retention and Access

We retain data for at least as long as required by applicable law, and for periods of time needed for Redwood Communities to pursue our business interests, conduct audits, comply with our legal obligations, resolve disputes, and enforce our agreements. You may access, correct, and/or update your information by accessing your accounts or profiles, where relevant, on the Site. You may request a summary of information we hold about you, as well as corrections, updates or deletion of your information as provided for under applicable law, by contacting us at privacy@redwoodhousing.com. Our response to such requests will be limited to information under our direct control. We will make reasonable efforts to respond promptly to such requests in accordance with applicable laws.

12. Security

We may employ industry standard procedural and technological measures that are reasonably designed to help protect your personally identifiable information from loss, unauthorized access, disclosure, alteration or destruction. Redwood Communities may use, without limitation, firewalls, password protection, secure socket layer, and other security measures to help prevent unauthorized access to your personally identifiable information. Users are responsible for maintaining the confidentiality of their own passwords to access the Sites. However, no security can be 100% effective, and you should not expect that your information will remain private under all circumstances. If you have reason to believe that the security of your Personal Information has been compromised, please immediately notify us by contacting us at privacy@redwoodhousing.com.

13. Privacy Notice for Residents of Certain U.S. States

This section supplements the information provided in the Privacy Policy above and applies to visitors and users who are residents of the state of California. For purposes of this Statement, “Personal Information” has the meaning given in the California Consumer Privacy Act of 2018, as amended. (“CCPA”). This section also applies to visitors and users who are residents of other U.S. states with data privacy laws in effect having requirements similar to the CCPA. This section does not address information exempted from the scope of the CCPA or similar laws in other U.S. states.

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 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.

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 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), race, color, ancestry, national origin, citizenship, religion or creed, marital or familial status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy	No

	or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information), medical conditions, political affiliations or activities, status as a victim of domestic violence, assault, or stalking.	
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, resumes and CVs, background checks, and other employment-related information.	No
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	Yes

	the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	
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The table below describes the sources for each category of personal information we collect, and the third parties with whom we share each category of personal information we collect.

Category	Sources	Third Parties Shared With
1. Identifiers	<ul style="list-style-type: none"> ● Directly from consumers or their agents ● Website cookies ● Website analytics providers ● Affiliate companies ● Publicly available information 	<ul style="list-style-type: none"> ● Affiliate companies ● Website providers ● Analytics providers ● Advertising providers ● Telephone service providers ● Cloud service providers ● Social networks ● Market research providers ● Professional advisors (accountants, auditors)
2. Customer Records Information		
3. Characteristics of protected classifications under California or federal law		
4. Commercial information.		
5. Biometric information.	<ul style="list-style-type: none"> ● Telephone calls 	<ul style="list-style-type: none"> ● Telephone service providers ● Analytics providers
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"> ● Website providers ● Advertising providers
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"> ● Website providers ● Analytics Providers ● Advertising providers
8. Sensory data		
9. Professional or employment-related information		

10. Education information		
11. Inferences	<ul style="list-style-type: none"> ● Website analytics providers ● Advertising providers 	<ul style="list-style-type: none"> ● Analytics Providers ● Advertising providers

The business and/or commercial purposes for which we use and share the above categories of personal information include:

- To fulfill specific consumer requests
- To enhance the website experience
- For marketing purposes
- For security and fraud prevention purposes
- To cooperate with public or government authorities, or comply with legal processes
- To enforce our contracts
- To protect the safety, rights, or property of users, the public, or Redwood Communities
- For internal training
- For marketing
- For analysis
- To analyze website traffic

Personal Information We Disclose

a. *Sale of Personal Information*

We do not sell personal information, and have not sold your Personal Information in the past 12 months.

b. *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.

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

You have the right to request that Redwood Communities 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.

b. *Right to Delete Personal Information*

You have the right to request that Redwood Communities delete personal information we may hold about you, subject to certain exceptions as permitted under applicable law. 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, legal 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 or Sharing of Personal Information

You have the right to opt out of the sale of your personal information, or the sharing of your personal information for certain purposes.

Because we do not sell personal information, this right does not apply to Redwood Communities.

d. Right to Limit Use or Disclosure of Sensitive Personal Information

You may have the right to limit the use or disclosure of your sensitive Personal Information, where collected and as permitted under applicable law. You may exercise this right following the methods described under the subsection titled “Exercising Your Rights” below.

e. Right to Non-Discrimination

You have the right to not receive discriminatory treatment from Redwood Communities 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:

- Email privacy@redwoodhousing.com; or
- Call Redwood Communities at 206-688-2080.

To verify your request we will verify your name, email address and phone number.

You may designate an authorized agent to submit a request on your behalf. To designate an authorized agent, send us a signed authorization letter.

We will respond to your rights request within forty-five (45) 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

Redwood Communities does not offer financial incentives or price or service differences in exchange for the retention or sale of personal information.

13. Notice to Users Located Outside of the United States

This Site and the services on this Site are targeted for users in the United States of America only. Any information you enter on this Site may be transferred outside of your home country to the United States of America, which may not offer an equivalent level of protection to that required of your home country's data protection laws.

Contact Us

If you have any questions regarding this Privacy Policy please contact us via email at privacy@redwoodhousing.com or by phone at 206-688-2080.