

Edgewood/Vantage Privacy Policy

Last Updated: December 8, 2022

This Privacy Policy describes how Edgewood Management Corporation and Vantage Management, Inc. (collectively referred to in this Privacy Policy as “Edgewood/Vantage” “we,” or “us”) collects, uses, and discloses your personal information both offline and on the websites, apps, and services where this Privacy Policy appears or is referenced.

By accessing a Edgewood/Vantage website, app, or service from which this Privacy Policy is referenced, you confirm that you have read, understand, and acknowledge the terms of this Privacy Policy. This Privacy Policy is not a contract and does not create any legal rights or obligations.

If you are a California resident, see Section 6 for information provided pursuant to the California Consumer Privacy Act, including how to request that we not “sell” your personal information.

SECTION 1. We collect and use personal information from and about you.

Edgewood/Vantage (and the vendors and other parties we use to perform services on our behalf, including, for example, building managers, real estate brokers, and service providers) collect, receive, and develop several categories of personal information about you depending on the nature of your interactions with us. For example:

We collect Contact Information and Other Identifiers. For example, we might collect your name, email address, account username and password, alias, government-issued ID (including, for example, driver’s license and passport), social media account handles, phone number, date of birth, government ID numbers (including, for example, tax ID number, Social Security number), and mailing address. At our security desks, for example, we might also collect information from your driver’s license, photos, or other identification documents you provide.

We collect Commercial, Customer Records, and Preference Information. For example, we may collect information about your leasing details, apartment rental history, property records, tenant data, signatures, and your other transactions and preferences. We may also collect your comments that you post on our websites or blogs and your responses to surveys you complete. In certain circumstances such as in the case of a residential rental or lease application, we may collect or ask you to provide additional personal information such as government issued identification, financial and tax information, source of income,

employment information, and rental history information. At parking garages, lots, and facilities at certain of our properties, we may use license plate reader technology to collect license plate and vehicle-related information including a photograph of the license plate (which may include parts of the vehicle surrounding the license plate), the GPS location of the vehicle, and the time and date of the read.

We collect Device, Internet and Network Activity Information. For example, if you use our websites or apps, we may collect information about the browser, device and operating system you are using, signal strength, device identifiers, MAC address, and your IP address. We might collect information at the site you came from, or the site you visit when you leave us. We may collect and record page and app interaction information and other electronic communications and content from your use of the site and app (such as content entry, mouse movements, screen captures, the date, time, and location of your visit, what areas of the websites you visit and for how long, what search terms or other data you enter, and what products or content or links you view and click on), and methods used to browse away from the page. If you use our mobile apps, we may also look at how often you use the app and where you downloaded it. We may also embed technologies (which may include, for example, web beacons, tags, and pixels) in the emails and other communications we or our vendors send to you to help us understand how you interact with those messages, such as whether and when you opened a message or clicked on any content within the message. We may also collect information from your devices if they connect to, or are detected by, the wireless networks at our properties. We might also collect information about how you use our Wi-Fi network and other services, such as the websites you visit while using our Wi-Fi network. We may engage or otherwise permit other parties to also collect information in these ways.

We collect Location Information. We may automatically collect your precise GPS location when you access our apps or our websites. We may also automatically collect your precise GPS location when your Wi-Fi or Bluetooth-enabled device connects to, or is detected by, the wireless networks at our properties. We also collect information about your general location, using your zip code or postcode and IP address.

We collect Demographic Information. We may collect information like your ethnicity, sex, gender, birth date, age, language spoken, disability, housing status, household size, household type, family members, marital status, annual household income, desired housing characteristics and desired housing location or community.

We collect Payment Information. For example, we collect your credit and debit card, bank account information, voucher/subsidy information, and other payment details if you make a purchase or sign up for or through some of our services.

We collect Employment-Related and Education Information. When you apply for a job, we collect information you submit as part of your application and resume. This might include your work experience and previous employment, your education, the URL to your personal or professional websites, your workplace skill sets and certifications, whether you need a visa or require sponsorship, and/or salary expectations. We may also conduct a credit check, background check, and employment verification to the extent permitted by applicable law. If you apply for a job, you may choose to also voluntarily provide any of the following information: ethnicity, gender, disability status, and/or veteran status.

We collect Audio/Visual/Thermal Information. For example, when you visit certain properties, we may capture or collect photographs and record audio and video at the property (including through the use of CCTV cameras and other technologies). We may also collect information using magnetometers, infrared and heat sensing technologies at certain properties. We may also record audio during customer service calls.

We collect Information You Submit, Provide, or Post. For example, we collect feedback and any other information you provide when you contact us.

SECTION 2. We use personal information as described here.

We use the above-referenced categories of personal information for the following purposes:

We use information to provide our services and fulfill transactions. For example, we use information in connection with the management, operation, leasing of properties. We also use information to fulfill your requests and provide you with products and services.

We use information for marketing purposes. For example, we might use personal information in connection with special promotions, discounts, purchase incentives, or offers. We might also use this information to send push notifications on our apps and to serve you ads about our properties, services and offers. We might tell you about new features or services. These might be our own offers or services, or third-party offers or services we think you might find interesting. To learn about your choices for these communications, read Section 5 below.

We use information to provide support and to respond to your requests or questions. We use information to contact you in response to your feedback or other matters related to our relationship with you (such as about this Privacy Policy). If your inquiries or feedback relate to your lease or an account, we may also use your information to address the matter.

We use information to test, develop, analyze, improve, and provide our products, properties, and services. For example, we may use your information to make our websites, apps, services, properties, and products better. We might use your information to customize your experience with us and to conduct research and analysis.

We use information to comply with our obligations, administer our websites and services, and for property management or internal operations. For example, we use personal information to administer the websites, such as troubleshooting, data analysis, and testing. We also use personal information when onboarding vendors.

We use information for security, safety, compliance, and due diligence purposes. For example, we may use personal information to protect our company, properties, customers, business partners and their respective personnel. We may also use personal information to protect our websites, apps, or services, as well as to detect and investigate activities that may be fraudulent, or otherwise illegal or prohibited (such as cybersecurity events or fraudulent transactions). We may use information in connection with physical access control. We may also use information to conduct background, employment, and credit checks and to assess financial, reputational, credit, and other risks arising from any relationship or prospective relationship with you where permissible by law.

SECTION 3. We collect personal information about you from various sources.

We and our vendors collect personal information about you from various sources, directly and indirectly, including from the following sources:

We collect personal information directly from you. For example, we collect information if you sign up for an account, register to access the wireless network at our properties, enter into an agreement, participate in a promotion, contact us, sign up for our text and other messages, or sign up for alerts or other emails. We also collect payment if you make a payment/purchase, and we collect Employment-Related Information if you apply for a job. We also collect any personal information you provide if you post a comment, make a request, or complete a survey. When you visit certain properties, we may collect video or image information about you using cameras and sensors.

We collect personal information from your devices. We use tracking tools like browser cookies and web beacons to automatically collect information about you. We collect information using these tracking tools when you interact with our websites, apps, ads, or emails that we or our vendors send to you. We may also collect information from your devices passively using Wi-Fi technology. For example, we may collect information from your devices if they connect to, or are detected by, the wireless networks at our properties. This information may include your location, MAC address, signal strength, date/time stamp,

wireless access point location (which can be associated with a physical location), device manufacturer and operating system, and your use of the Wi-Fi, such as which websites you visit. We might also use Bluetooth beacons at our properties that may communicate with your device and identify your device's location. To learn about your choices for these tracking tools, read Section 5 of this Privacy Policy.

We receive personal information from vendors we hire to work on our behalf. For example, vendors that host or maintain our websites and apps or send promotional emails for us may give us information. Our employment and recruiting vendors also give us information. Our marketing agencies, advertising technology vendors, and analytics providers may also provide us with information.

We receive information about you from other sources. Other parties may give us personal information about you. These other parties might also include business and marketing partners and social media platforms that give us information they have collected either directly or indirectly from you. We may also receive personal information from your employer, credit check databases, background check providers, record verification providers, real estate brokers, and other parties in the real estate sector. We may also receive Employment-Related Information from a job network or social network if you choose to import your information from those platforms when applying for a job with us. We also use features that let your friends give us your information.

We combine information. We may combine information that we have collected offline with information we collect online. Or we may combine information we get from another party with information we already have. We may also aggregate your information with other consumers' information to understand preferences and trends over time.

SECTION 4. We share your personal information with other parties.

We may share each category of personal information within the Edgewood/Vantage family of companies. This includes our parent, subsidiaries, affiliates, and business units. We may also share personal information with subsidiaries, affiliates, and business units of our parent company. We share personal information within the Edgewood/Vantage family of companies for all purposes described in this Privacy Policy.

We share your personal information with vendors and service providers who perform services on our behalf. We may share personal information with vendors who assist us with the uses of personal information described in this Privacy Policy. This may include vendors who send emails for us, help us manage and operate our websites and apps, manage our properties, fulfill purchases, provide tenant and guest services, provide advertising or marketing services or place our advertisements on other platforms, provide analytics and

search engine support, investigate and prevent data incidents, provide physical and digital security services, audit our business and financial statements, vet job applicants, and provide legal advice. Personal information received by vendors and service providers may also be subject to their privacy policies.

We share your personal information with our clients, business partners and marketing companies. We might share information with third parties who co-sponsor a promotion or promote our services. Some of these partners may send you information about products or services by mail or email. They may share your information with other third parties. We may also share the above categories of personal information with companies that help us with our marketing efforts, including social media platforms, advertising networks, and ad tech companies. For example, we may share email addresses or other contact information with social media platforms so they can serve our advertising to you on their platform. Personal information received by our partners and other parties may also be subject to their privacy policies.

We will share your personal information for safety and security purposes, if we think we have to in order to comply with the law, or to protect ourselves, our customers and others. We may share any or all personal information to respond to a court order or subpoena. We may also share any or all personal information if a government agency or investigatory body requests it. We might share your personal information in order to enforce our agreements and to protect our rights and/or the rights of others. We might share your personal information when we are investigating potential fraud.

We may share your personal information as part of a transaction, financing, due diligence or for other business needs. For example, if Edgewood/Vantage sells any of its businesses or assets, applies for loans, or opens bank accounts, we may disclose your personal information to the prospective buyer, lender or bank, as the case may be, as part of certain due diligence processes. We also share information for the purpose of management and administration of Edgewood/Vantage's business.

We may share your personal information with a successor to all or part of our business. If part of our business (including any of our affiliates, divisions, and business units) is acquired by a third party, we may include personal information as part of that transaction, which may include some or all categories of your personal information. We may also share your personal information if there is a change to our corporate structure. We may also share your information with others as they conduct diligence of our corporate changes.

We may share personal information for other reasons we may describe to you from time to time or as permitted or required by law.

SECTION 5. You have certain choices about how we use your personal information.

You can opt out of receiving our marketing emails and text messages. To stop receiving our promotional emails, you can follow the instructions in any promotional message you get from us. If you receive promotional text messages from us, you may opt out by replying "STOP". Even if you opt out of getting marketing messages, we will still send you transactional messages. These include responses to your questions.

You can control if we share information with third parties for their marketing purposes. To opt out of having us share your information with third parties for their promotional purposes, please send an email to marketing@emcmgmt.com.

You can control certain location tracking tools. To control the collection of your precise location on your mobile device, you can adjust the settings on your mobile device, such as by disabling location services and turning off the Bluetooth and Wi-Fi. To learn more about mobile location analytics and certain options with respect to mobile location analytics, visit <https://smart-places.org>.

You can control certain cookies and tracking tools. To learn more about the cookies we use and to set your cookie preferences, click on the Cookie Settings link in the footer of each Edgewood/Vantage website you visit. If there is no link available, then follow the instructions outlined below. Keep in mind that the cookies used on our various websites will differ and you will need to set your preferences on each Edgewood/Vantage site you visit. Your browser may also give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. Since flash cookies do not reside in your browser, your browser settings will not affect them. To control flash cookies, you thus need to click [here](#).

We and third-party advertising networks, social media companies, and other services may collect information about your use of our websites and apps over time so that they or we may display interest-based advertising using information gathered about you over time across multiple websites or other platforms. To do this, we and our vendors use several tracking tools, such as browser cookies, web beacons, and other technologies. To set your preferences related to this type of information collection and use, click on the Cookie Settings link in the footer of each Edgewood/Vantage website you visit. You can also visit www.aboutads.info/choices and <https://optout.privacyrights.info/> to opt out of certain uses of cookies for advertising purposes. We use Google Analytics to better understand how our users interact with our websites. You can learn about Google Analytics' currently available opt-outs at <https://tools.google.com/dlpage/gaoptout/>.

SECTION 6. Your California Privacy Rights.

If you reside in California, you have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email, or write to us at the address listed below. Indicate in your letter that you are a California resident making a “Shine the Light” inquiry.

If you reside in California, you can make the following more specific requests with respect to your personal information:

- Access – You can request that we disclose to you the categories of personal information we collected about you, the categories of sources from which we collected the personal information, the categories of personal information we sold or disclosed, our business or commercial purpose for collecting and selling the personal information, the categories of third parties with whom we shared the personal information, and the specific pieces of personal information we collected about you over the past 12 months.
- Deletion – You can request that we delete your personal information that we maintain about you, subject to certain exceptions.
- Do Not Sell My Personal Information – You can request that we not sell your personal information by emailing marketing@emcmgmt.com. For purposes of this Privacy Policy, “sell” means the sale of your personal information to an outside party for monetary or other valuable consideration, subject to certain exceptions set forth in applicable California law. Please note that if you make a request to opt out of sale, note that if you would like to opt out of cookie-based tracking for advertising purposes, you will need to separately click the Cookie Settings link in the footer of each Edgewood/Vantage website you visit to set your preferences. You can also visit www.aboutads.info/choices and <https://optout.privacyrights.info> to opt out of certain uses of cookies for advertising purposes. Your selections are specific to the device, website and browser you are using. Your selections are deleted whenever you clear your cookies or browser’s cache.

Edgewood/Vantage will not discriminate against you because you made any of these requests.

California residents can make these requests by emailing us at marketing@emcmgmt.com or by calling us at (301) 562-1600. We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for leasing, tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests.

Except as otherwise provided by applicable California law, note that for purposes of these requests under this Section, personal information does not include information about job applicants, employees and other of our personnel; information about employees and other representatives of third-party entities we may interact with; or information we have collected as a service provider to our clients.

We will take reasonable steps to verify your identity prior to responding to your requests. For example, we may utilize a third-party verification provider to assist with verifying your identity. The verification steps may vary depending on the sensitivity of the personal information and whether you have an account with us.

California residents may designate an authorized agent to make a request on their behalf. When submitting the request, please ensure the authorized agent is identified as an authorized agent.

For purposes of California residents making these requests, please also note the following regarding how we collect, use, and share your personal information as described in this Privacy Policy, including in the previous 12 months:

We may collect, use, and disclose for our business and commercial purposes, categories of personal information as set forth in applicable California law, including: Identifiers; payment and customer records information; characteristics of protected classifications under California or federal law (such as demographic information like age, gender, and disability); commercial information; professional or employment information; internet or other electronic network activity information; geolocation data; education information; audio, electronic, visual, thermal, or similar information; and inferences. See Section 1 and Section 3 above for additional detail.

We collect and use these categories of personal information for the business and commercial purposes described in Section 2 of this Privacy Policy.

We collect these categories of personal information from the sources described in Section 3 above.

We may disclose each of the foregoing categories of personal information for the business and commercial purposes described in this Privacy Policy to the extent permitted by applicable law to the categories of third parties as described in Section 4 of this Privacy Policy.

We may "sell" categories of personal information, including: Identifiers; payment and customer records information; characteristics of protected classifications under California or

federal law; commercial information; professional or employment information; internet or other electronic network activity; geolocation data; education information; audio, electronic, visual, thermal, or similar information; and inferences. We may “sell” these categories of Personal Information to the categories of third parties described in Section 4 of this Privacy Policy.

From time to time, we may offer financial incentives in connection with the collection or use of personal information. The material terms of the financial incentive will generally be presented to you at the time you sign up. You may withdraw from any financial incentive at any time by emailing us at marketing@emcmgmt.com or by calling us at (301) 562-1600.

Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our site may not work. If you block or reject cookies, not all of the tracking described here will stop.

Options you select and choices you make are browser, website and device specific. If you clear your cookies or your browser’s cache, you will need to set your preferences again.

SECTION 7. Our websites and services are not intended for children.

Our websites and our services are meant for adults. We do not knowingly collect personal information from children under 16. If you are a parent or legal guardian and think your child has given us information, you can contact us at marketing@emcmgmt.com.

SECTION 8. We use standard security measures.

The Internet is not 100% secure. We cannot promise that your use of our websites, apps, or services will be completely safe. Any transmission of your data to our websites or apps is at your own risk. We encourage you to use caution when using the Internet. We keep personal information as long as it is necessary or relevant for the practices described in this Privacy Policy, including, for example, for legal compliance, dispute resolution, contract enforcement, backup, archival, and other internal operations purposes. We also keep information as otherwise required by law. Personal information may be accessed by persons within our organization, or our third-party vendors, and those other parties described in this Privacy Policy, including those who require such access to carry out the purposes described in this Privacy Policy, and such other purposes as permitted or required by applicable law.

SECTION 9. We may link to third-party sites or services we don't control.

If you click on a link to a third-party site or a third-party app, you will be taken to a website or service we do not control. This Privacy Policy does not apply to the privacy practices of that website or services, which may collect information from you. Read the privacy policy of other websites, apps, and services carefully. We are not responsible for these third-party websites, apps, and services or their policies.

SECTION 10. We may process and store information in the United States.

Information we collect from you may be transferred to, processed in, or stored in the United States. The standard of data protection in the United States may not be adequate when compared to the data protection standards of other countries. By using our websites, apps, and services or submitting your personal data, you consent to such transfer, storing and processing.

SECTION 11. Feel free to contact us.

If you have any questions about this Privacy Policy or your information, please email us at marketing@emcmgmt.com. You can also write to Edgewood/Vantage, 9711 Washingtonian Blvd, Suite 200, Gaithersburg, Maryland 20878. You can also call at (301) 562-1600.

SECTION 12. We may update this Privacy Policy.

From time to time we may change this Privacy Policy. We will notify you of any material changes to our Privacy Policy to the extent required by law. We will post an updated copy on our websites. Please check our websites periodically for updates. Your continued use of our websites, apps, and services means that you consent to the collection, use and disclosure of your personal information as set out in the updated Privacy Policy.