

# Privacy Policy

**Effective Date: January 1, 2023**

Demmon Partners, LLC (collectively, “Demmon Partners,” “we,” “us” and “our”) respects the privacy of its customers, business partners, job applicants and Websites visitors (“You” and “your”). Protecting your private information is our priority. In providing our services, we may collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to, directly or indirectly, you (“Personal Information”).

This Privacy Policy (the “Policy”) describes how we treat data and your Personal Information that Demmon Partners collects and receives through this website, and other Demmon Partners websites that link to this Privacy Policy (collectively, “Websites” and individually “Site”), and other aspects of Demmon Partners’ business, whether online or offline.

This Policy does not apply to the practices of companies that Demmon Partners neither owns nor control

By using and accessing any of the Websites, you agree to the terms and conditions of this Policy. This Policy may change from time to time and your continued use of the Websites after we make changes is deemed to be acceptance of those changes. Please check the Policy periodically for updates. If you have any questions or concerns about our use of your Personal Information, please contact us using the contact details provided at the bottom of this Policy.

## 1. Personal Information Collection

We may collect Personal Information from you. Under the California Consumer Privacy Act of 2018 (the “CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”), to “collect” means to buy, rent, gather, obtain receive, or access any Personal Information of a California resident. While we may not retain Personal Information from you, we may nonetheless “collect” Personal Information when using that definition. The types of Personal Information we collect will depend on much you engage with our Websites and their services.

To provide services offered by Demmon Partners, we must process information about you, including Personal Information, whether or not you are registered or logged in. However, we do not use your data for automated decision making.

Here is a summary of categories of Personal Information we may have collected from you over the past 12 months, depending on how you use our services, as well as how we use it and with whom we may have shared it.

**This Section does not apply to California-based job applicants, contractors or similar individuals. For California-based job applicants, contractors or similar individuals, please see privacy policy for the Personal Information collected.**

## Categories of Personal Information

Category	Examples	Collected Identifiers	
Name, postal address, unique personal identifier, online identifier, Internet Protocol (“IP”) address, email address, Social Security number, or other similar identifiers.	Note: Personal Information does not include publicly available information from government records	Yes	
<b>Personal Information referenced in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	A name, signature, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, employment history	Notes: Some Personal Information included in this category may overlap with other categories. Personal Information does not include publicly available information from government records	<b>Yes</b>
<b>Protected classification characteristics under California or federal law.</b>	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<b>Yes</b>	
<b>Commercial information.</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<b>Yes</b>	
<b>Biometric information.</b>	Physiological, biological, or behavioral, characteristics (including DNA) that can be used to establish individual identity, such as fingerprints and eyes, or behavioral characteristics	<b>No</b>	
<b>Internet or other electronic network activity.</b>	Browsing history, search history, information on a consumer’s interaction with an internet website, application, or advertisement.	<b>Yes</b>	
<b>Geolocation data.</b>	Physical location or movements.	<b>Yes</b>	

<b>Sensory data.</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	<b>Yes</b>	
<b>Professional or employment-related information.</b>	Current or past job history	<b>Yes</b>	
<b>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g, 34 C.F.R. Part 99)).</b>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	<b>No</b>	
<b>Inferences drawn from other Personal Information to create a profile about a consumer.</b>	Profile reflecting a consumer's preferences, characteristics, behavior, attitudes, intelligence, abilities, and aptitudes.	<b>Yes</b>	
<b>Sensitive Personal Information.</b>	Any private information that divulges any of the following such as personal identification numbers, including social security, driver's license, passport, or state ID card numbers>	<b>yes</b>	

## 2. How is This Information Collected?

- Directly from you when you provide it to us./li>
- Indirectly through one of our third parties that either store the details you provided to process billings information or send email campaigns.
- Information we receive from you when you contact our main office or other Demmon Partners offices for any inquiries.
- Information that you provide by filling in forms on our Websites. We may also ask you for information when you enter a contest, fundraiser, or promotion sponsored by us, and when you report a problem with our Websites.
- Your responses to surveys that we might ask you to complete for research purposes.
- **Information through cookies and similar technologies.**

We may automatically collect Personal Information as you navigate through the Websites. Information collected automatically by us or companies acting on our behalf may include, but is not limited to, log and usage data, IP addresses, cookies, pixel tags, web beacons, device data, location data, and other tracking technologies.

You may stop or restrict the placement of technologies on your device or remove them by adjusting your preferences as your browser or device permits.

## Log and Usage Data

Log and usage data is service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Websites and which we, or a third party acting on our behalf, record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Websites (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

## Cookies

Cookies are small text files placed in visitors' device browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the services may not work properly. These cookies and other related technology allow third party companies to help us improve your experience on our Websites, understand how the Websites are being used, and measure the number of visitors to the Websites. We also work with third parties who may place cookies on your web browser to enable us to serve you with advertising based on your search activity.

Your web browser may tell you how to be notified when you receive certain types of cookies and how to restrict, reject or disable certain cookies. For more information about removing cookies for your specific web browser, visit [allaboutcookies.org/manage-cookies/clear-cookies-installed.html](http://allaboutcookies.org/manage-cookies/clear-cookies-installed.html).

## Pixel Tags/Web Beacons

A pixel tag (also known as a web beacon) is a piece of code embedded on the Websites that collects information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.

## Device Data

>We, or a third party acting on our behalf, may collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system configuration information.

## Information collected from other sources.

To enhance our ability to provide relevant marketing, offers and services to you and update our records, we may obtain information about you from other sources, such as public databases, analytics providers (such as Google Analytics, Facebook Insight, and Geotargeted), data providers, social media platforms, service providers as well as from other third parties. If you interact with us on a social media platform using your social media account (e.g. Facebook or Twitter), we receive Personal Information about you such as your name, email address, and gender. Any Personal Information that we collect from your social media account depends on your social media account's privacy settings.

## 3. Use of Personal Information

We may use any of the Personal Information we collect for the following business-related purposes:

- **To enable user-to-user communications.** We may use your Personal Information to enable user-to-user communications with each user's consent.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our services.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To allow you to access amenities, Site features and request service.** We may use your information to assist you in maintenance requests, access to property amenities, and other services.
- **To resolve bugs, troubleshoot problems, security incidents, and improve Site operation.** We may use your information as part of our efforts to keep our Websites safe and secure (including to protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity).
- **To improve, upgrade or enhance our Websites and services.**
- **To fulfill and manage your lease applications.** We may use your information to fulfill and manage your lease applications, payments, returns, and exchanges made through the Websites.
- **To administer prize draws and competitions.** We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- **To send administrative information to you.** We may use your Personal Information to send you service, updated, and new feature information and/or information about changes to our terms, conditions, and policies.
- **To send you marketing and promotional communications.** We may deliver targeted advertising, coupons, newsletters, and other information regarding promotions, the Site and properties we manage to you.
- **To compile anonymous statistical data and analysis for use internally or with third parties. We may monitor and analyze usage and trends to improve your experience with the Site.**
- **To request feedback.** We may use your Personal Information to request feedback and to contact you about your use of our Websites.
- **To operate our Websites and provide our services in accordance with our agreements you may have with us.**
- **To carry out other purposes that are disclosed to you and/or to which you consent.**
- **To pursue our legitimate interests where your rights and freedoms do not outweigh these interests.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

## 4. Personal Information Sharing

No "Selling" or "Sharing" of Personal Information: Demmon Partners does not sell your Personal Information or share your Personal Information for the purpose of behavioral advertising and we do not allow any Personal Information to be used by third parties for their own marketing purposes. We do not exchange your Personal Information with others for monetary or other valuable consideration. We may process or share your Personal Information that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent or authorization to use your Personal Information in a specific purpose.

- **Performance of a Contract:** Where we have entered into a contract with you, we may process your Personal Information to fulfill the terms of our contract.
- **Vendors, Consultants and Other Third-Party Service Providers:** We may share your data with utility billing providers, cable companies, third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis (such as Google Analytics, Facebook Insight, and Geotargeted), email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Websites, which will enable them to collect data on our behalf about how you interact with our Websites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Third-Party Advertisers:** We may use third-party advertising companies to serve ads when you visit or use the Websites. These companies may use information about your visits to our Websites and other websites that are contained in web cookies and other tracking technologies to provide advertisements about goods and services of interest to you.
- **Business Partners:** We may share your Personal Information with our business partners to offer you certain products, services or promotions.
- **Other Users:** If you interact with other users of our Website and register for our Website through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Website, and view your profile.
- **Legal Obligations:** We may disclose your Personal Information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your Personal Information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Business Transfers:** We may share or transfer your Personal Information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.

## 5. Unaffiliated Third-Party Links/Websites

Our Websites may contain links to other websites or services that Demmon Partners neither owns nor operates. Websites hosted by third party service providers, such as RENTCafe.com, may appear as if you are still on a Site. To tell whether you are on one of the Websites or viewing third party content, please check the URL address in your browser's address window.

We encourage you to read the privacy statements of each and every third party website and service provider before providing any personally information to them. We are not responsible for the privacy practices of third parties. If you choose to visit or use any third party websites, including those offered by

our third party service providers or other partners, please be aware that this Policy will not apply to information that you disclose to third parties

## 6. Opt-Out and Do-Not-Track Signals

Do Not Track (DNT) is a web browser setting that requests that a website or web application disable its tracking of a user's browsing data. Various web browsers (including Internet Explorer, Google Chrome, Firefox, and Safari) offer a "do not track" option, which sends a signal to websites visited by the user about his or her browser DNT preference setting.

We do not directly respond to "Do Not Track" signals and no common industry standard for DNT has been adopted. We do not permit third parties other than our analytics and other service providers to track the users' activity on the Websites. We do not track your online activity on other online services over time.

You may opt-out of data collection from certain companies:

- We use Google Analytics to collect and analyze information about the use of our Websites. This information helps us measure the effectiveness of our marketing campaigns. If you have an account with Google, you can manage your advertising settings, otherwise [you can manage these settings through your web browser](#).
- You may also opt-out of Google Analytics by installing Google's opt-out browser add-on [here](#). Please review Google's terms of service and privacy policy before installing. You can learn about Google's practices by clicking [here](#).
- We also use Facebook Insights to collect and analyze information about the use of our Websites. For more information about Facebook's collection and use of this data and your rights and choices about protecting your privacy, please refer to Facebook's Privacy Policy. For logged-in users' deactivation, please check <http://www.facebook.com/settings/>. To do this you must be logged in on Facebook or Instagram.
- You may also opt out of the automated collection of information by certain third-party ad networks for the purpose of delivering advertisements tailored to your interests, by visiting the [consumer opt-out](#) page for the Self-Regulatory [Principles for Online Behavioral Advertising](#).

Because those opt-out pages are specific to your browser used to visit it and because we do not have control over those unaffiliated third party websites, we are unable to perform the opt-outs on your behalf.

## 7. Notice at Collection for Job Applicants, Contractors, Or Similar Individuals

Pursuant to the CCPA, this section is a Privacy Notice pertaining only to Personal Information Demmon Partners may collect about a California resident in the course of such person acting as a job applicant to, contractor to, or similar individuals of Demmon Partners. During the course of your application for work with us, we may collect certain information about you. The categories of information we may collect, and the purposes for collecting them, include:

Category of Information	Why We Collect it
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<p>Identifiers. This category includes name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers</p>	<p>Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding</p>
<p>Personal information, as defined in California Civil Code section 1798.80 This category includes contact information, name, signature, social security number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit or debit card number, other financial information, medical information, health insurance information</p>	<p>Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding</p>
<p>Protected classification information This category includes characteristics of protected classifications under California or federal law</p>	<p>Comply with applicable state and federal Equal Employment Opportunity laws</p>
<p>Internet or other electronic network activity information This category includes without limitation Internet or other electronic network activity information such as browsing history, search history, and information regarding your interaction with internet web sites and applications</p>	<p>Facilitate the efficient and secure use of the company's information systems, ensure compliance with company policies and procedures, and investigate complaints and any suspected violations of company policy.</p>
<p>Geolocation This category includes physical location or movements such as GPS location data</p>	<p>Improve safety of employees, customers and the public with regard to use of Demmon Partners property and equipment. Prevent unauthorized access, use, or loss of Demmon Partners property</p>
<p>Professional or employment-related information This category includes without limitation work history, prior employer, references, qualifications, skills and experience, human resources data, emergency contact information, and data necessary for benefits and related administrative services</p>	<p>Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding</p>
<p>Education Information This category includes education history</p>	<p>Process, evaluate, and communicate with an individual about his or her application and assess his or her eligibility and fit for the role for which the individual applied</p>



Inferences drawn from any of the Personal Information listed above	Assess qualifications for certain positions to create a profile reflecting his or her preferences, characteristics, behavior, attitudes, intelligence, abilities, and aptitudes
Sensitive Personal Information This category includes any private information that divulges any of the following such as personal identification numbers, including social security, driver's license, passport, or state ID card numbers	Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding

## 8. Security of Personal Information

We use appropriate technical and organizational security measures to protect the security of your Personal Information both online and offline including the implementation of access controls, firewalls, network intrusion detection, and use of anti-virus software. These measures vary based on the sensitivity of the Personal Information we collect, process, and store, and the current state of technology. We or a third party acting on our behalf will store the data necessary for the encryption, especially the public and private keys (the private keys are stored encrypted, for us it is not possible to decrypt any private key). However, as technology continues to develop overtime, there is no storage, or transmission of data over the Internet that is guaranteed to be completely secure. We therefore cannot guarantee to providing absolute security. Although we will do our best to protect your Personal Information, transmission of Personal Information to and from our Websites is at your own risk. You should only access the Websites within a secure environment.

## 9. Retention of Your Personal Information

Demmon Partners will retain your Personal Information, including sensitive Personal Information, only for as long as is necessary for the purposes set out in this Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Demmon Partners will also retain Usage Data (i.e., data collected automatically, either generated by the use of the service or from the service infrastructure itself, such as the duration of a page visit) for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

## 10. CCPA: Your Rights and Choices (California Residents Only)

Under the California Consumer Privacy Act ("CCPA"), if you are a California resident, you are entitled to additional efforts to protect their privacy, these rights include:

- Right to Access/Know where you may request any or all of the following information relating to your Personal Information we have collected and disclosed in the last 12 months, upon verification of your identity:
  1. The specific pieces of Personal Information we have collected about you;
  2. The categories of Personal Information we have collected about you;
  3. The categories of sources of the Personal Information;
  4. The categories of Personal Information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
  5. The categories of Personal Information we have sold about you (if any), and the categories of third parties to whom the information was sold; and
  6. The business or commercial purposes for collecting or, if applicable, selling the Personal Information.
- Right to Request Deletion of Personal Information that Demmon Partners has collected of you
- Right to “opt-out” of the sale or sharing of Personal Information
- Right to No Retaliation for the Exercise of a Consumer’s Privacy Rights – a consumer (including employees, job applicants, or independent contractors) has a right not to receive discriminatory or retaliatory treatment by Demmon Partners for the valid exercise of privacy rights conferred by the CCPA/CPRA.
- Right to request that you limit a California consumer’s use and disclosure of your sensitive Personal Information
- Right to correct any inaccurate Personal Information We may deny your deletion request if retaining the information is reasonably necessary for the business or necessary for us or our service provider(s) to:
  - Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing relationship with you, or otherwise perform our contract with you.
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
  - Debug products to identify and repair errors that impair existing intended functionality.
  - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
  - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
  - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously impair the research’s achievement, if you previously provided informed consent.
  - Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
  - Comply with a legal obligation.
  - Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

To exercise any of your rights described above, please submit a request to us by either:

Mailing Address: Demmon Partners LLC  
 601 University Avenue, Suite 110  
 Sacramento, CA 95825

Email Address: [optout@demmonpartners.com](mailto:optout@demmonpartners.com)

You may only make a request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative. We reserve the right to confirm your California residency. Government identification may be required.
- If you wish to designate an authorized agent to make a request on your behalf, we will need to verify both your and your agent's identities, which may require submission of government identification. Your agent must also provide other proof of authority acceptable to us in our sole discretion.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. In certain cases, we may be permitted by law to deny your request.

Making a request does not require you to create an account with us. We will only use Personal Information provided in a request to verify the requestor's identity or authority to make the request.

#### 11. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. You have the right not to receive discriminatory treatment by Demmon Partners for the exercise of privacy rights conferred by the CCPA/CPRA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights. Unless permitted by the CCPA/CPRA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- We provide these tools for your benefit and we will never discriminate against you for using them. But if you choose to delete your data or close your account, we won't be able to offer you services that require us to use your data.

#### 12. Minors

Demmon Partners recognize 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 not directed to children under 13 (or other age as defined by local law). We do not target our services or the Websites to children. We also do not knowingly collect Personally Information from children. If we learn that we have collected any Personal Information from a child in violation of applicable law, we will immediately take steps to delete such information. If you learn that your child has provided us with Personal Information without your consent, please contact us using the contact information provided below.

#### 13. Disclaimer

Although our Site is accessible throughout the world, our Site is designed for and targets U.S. audiences, and is governed by and operated in accordance with the laws of the United States. We make no representation that our Site is operated in accordance with the laws or regulations of, or governed by, other nations, and we do not warrant or imply that our Site or content/materials on our Site are appropriate for use outside of the United States.

## 14. Changes to this Privacy Policy

We reserve the right to change this Policy at any time. If we make any material changes to this Policy, we will update the “Effective Date” at the top of this page and update our notices on the Websites. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this Policy to check for any changes.

## 15. Contact Us

If you have any questions about our privacy practices or this Policy, please contact us at:

Mailing Address: Demmon Partners LLC 601 University Avenue, Suite 110 Sacramento, CA 95825

Email Address: [optout@demmonpartners.com](mailto:optout@demmonpartners.com)