

# CAPREIT Privacy Policy

This Privacy Policy was last updated: 5/25/2023

Thank you for visiting [www.capreit.com](http://www.capreit.com), an internet website (“Site”) owned and operated by CAPREIT, INC (“CAPREIT” or “we”). This Privacy Policy (“Privacy Policy”) details CAPREIT’s information collection and use practices on this Site. This Privacy Policy does not govern information you might provide through a channel other than the Site. This Privacy Policy applies to all visitors to the Site.

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### **1. Privacy Policy Updates**

CAPREIT reserves the right to revise this Privacy Policy from time to time. If so, CAPREIT will post its updated Privacy Policy on the Site along with a change notice on the Site. The date the Privacy Policy was last revised is identified at the top of this page. Any revisions will be effective immediately upon posting on this Site. CAPREIT may also send registered users of our services a

notice that this Privacy Policy has been changed. CAPREIT encourages you to review this Privacy Policy regularly for any changes. You are responsible for periodically visiting our Site and this Privacy Policy to check for any changes. Your continued use of this Site after the posting of such notice will be subject to the terms of the then-current Privacy Policy.

## **2. Children’s Privacy**

Our Site is not intended for children under the age of 13. No one under age 13 may provide any Personal Information to or on the Site. CAPREIT does not target its services or this Site to children under 13. CAPREIT does not knowingly collect Personal Information from children under the age of 13.

## **3. Information Collection**

In order for you to interact with CAPREIT or have access to certain features of this Site, we collect Personal Information directly from you when you provide it to us and automatically as you navigate through the Site. We typically collect two kinds of information from and about users of our Site, directly from you when you provide it to us and/or automatically when you use the Site, including information:

- (1) That identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person (“Personal Information”); and/or
- (2) That is about you but individually does not identify you, such as aggregated information.

Personal Information does not include publicly available information, i.e., information that is lawfully made available from federal, state, or local government records. Personal Information does not include information that is deidentified or aggregate consumer information.

## **4. Information Use and Disclosure**

We may use your Personal Information to present our Site and its contents to you, deliver our services or information you have requested from us, fulfill any other purpose for which you provide it, 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, provide 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.

## **5. Cookies – Personal Information We Collect by Automated Means**

We collect certain information by automated means when you visit the Site, such as how many users visit the Site and other related analytics. We collect this information to learn how to improve the Site and how to best tailor it to our visitors. When you visit the Site, we may automatically collect some information about your visit using cookies, log analytics software, and other aggregate tracking technologies. We 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. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies.

On the Site, we 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 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**

CAPREIT utilizes analytics tools including third party technologies, such as Google Analytics, to collect information utilizing cookies. Google Analytics uses cookies to help us analyze how users use the Website. The information generated by the cookie about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Website, compiling reports on Website activity, and providing other services relating to Website activity and internet usage for us. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

Certain types of information, including geolocation, device type, onsite website usage and behavior, demographic data, and purchase history, is collected and aggregated across CAPREIT Site users for our analysis and advertising efforts.

## **7. Third Party Advertising Tools**

Some content or applications, including advertisements, on the Site are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

The major browsers have attempted to implement the draft "Do Not Track" ("DNT") standard of the World Wide Web Consortium ("W3C") in their latest releases. As this standard has not been finalized, CAPREIT's Website is not compatible with DNT and so, does not recognize DNT settings.

## **8. 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 CAPREIT 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.

## **9. Aggregate Information**

We may disclose aggregated information about our users without restriction. 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 Personal Information. We may use such information for purposes such as analyzing trends, administering the Site, and to understand how users interact with the Site.

## **10. Disclosure of Personally Identifiable Information**

We may disclose Personal Information that we collect, or you provide as described in this privacy policy to contractors, service providers, and other third parties we use to support our business. We do share some of the Personal Information collected with our advertising agencies for business purposes. For example, we engage with G5 Search Marketing, Inc. to assist us in creating and hosting this Site.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for one or more of the business purposes described in this Policy:

- [CATEGORIES OF DATA DISCLOSED]

We may also disclose your Personal Information; (a) to comply with any court order, law, or legal process, including to respond to any government or regulatory request; (b) to enforce our agreements, including for billing and collection purposes; and/or (c) if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of CAPREIT, our customers, or others. We collect only the minimum amount of information needed to provide services. If you do nothing during your visit to the virginia.gov website but browse or download information, we automatically collect and store the following information about your visit:

1. The Internet domain and IP address from which you accessed our site;
2. The type of browser and operating system you used;

3. The date and time you visited this site;
4. The pages visited; and
5. If you arrived from another website, the address of that website.

The information in our web logs is not personally identifiable, and no attempt is made to link it with the individuals that browse our website.

If you send us an e-mail message, we will collect the e-mail address and contents of the message, including audio, video and graphic information formats you send us. This may be to respond to you, to address issues you identify, to further improve our website or to forward your message to another agency for appropriate action.

We do collect personal information directly from individuals who volunteer to complete forms or participate in surveys, in order to deliver the services requested. We only collect, retain and use personal information where we believe it is essential to administer our business and to provide products, services and other opportunities requested by our customers.

We will not sell your Personal Information to any company or organization except we may transfer your Personal Information to a buyer or successor entity upon a merger, divestiture, restricting, reorganization, dissolution, or other sale or transfer of some or all of CAPREIT's assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by CAPREIT about our Site users is among the assets transferred.

## **11. Links to Third Party Sites**

The Site may provide links to other Web sites or resources over which CAPREIT does not have control ("External Web Sites"). Such links do not constitute an endorsement by CAPREIT of those External Web Sites. You acknowledge that CAPREIT is providing these links to you only as a convenience, and further agree that CAPREIT is not responsible for the content of 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.

## **12. Security**

We may employ industry standard procedural and technological measures that are reasonably designed to help protect your Personal Information from loss, unauthorized access, disclosure, alteration, or destruction. CAPREIT may use, without limitation, firewalls, password protection, secure socket layer, and other security measures to help prevent unauthorized access to your Personal Information.

## **13. Your State Privacy Rights**

If you live in a state with a specific privacy law, you may have additional rights to request certain information about the type of your personally identifiable information we share with third parties for direct marketing purposes and the identity of any such third party. Additionally, these states may provide their residents a number of rights as they relate to personally identifiable information. These

are the “right to know,” the “right to delete”, and the “right to opt-out”.

Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the applicable state privacy law. If you have questions or requests related to your rights under the any applicable state privacy laws, you (or your authorized agent) can also contact us at [postmaster@capreit.com](mailto:postmaster@capreit.com). You may be required to provide additional information to verify your identity and request before further action is taken. If you disagree with the decision on your request, you can ask us to reconsider it by responding to the team’s email.

#### **14. 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 [postmaster@capreit.com](mailto:postmaster@capreit.com) or by phone at 866-665-3338.