

Allure Lifestyle Communities Privacy Policy

Effective Date: March 1, 2024

This Privacy Policy (this “Privacy Policy”) covers the information practices of websites and mobile applications operated by Allure Lifestyle Communities and its Affiliates (“Allure”, “we”, “us”, or “our”), including <https://www.allurelife.com/> and all websites and mobile applications that link to this Privacy Policy (each referred to as a “Site”). Allure believes strongly in protecting your privacy and the confidentiality of your Personal Information (as defined below). We acknowledge that you may have privacy and security concerns with respect to the information we collect, use, and disclose to third parties. As a result, we have developed this Privacy Policy.

As used in this Privacy Policy, the term: (a) “Affiliate” means, a legal entity that Controls, is Controlled by or is under common Control with another legal entity or shares common branding with another legal entity; (b) “Control” means: (i) the ownership of, or power to vote, more than 50 percent of the outstanding shares of any class of voting security of a company; (ii) the control in any manner over the election of a majority of the directors or of individuals exercising similar functions; or (iii) the power to exercise controlling influence over the management of a company; and (c) “Personal Information” means any information, including sensitive data, that is linked or reasonably linkable to an identified or identifiable individual. For purposes of clarification, any information that is deidentified or publicly available information is not Personal Information.

PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY. By using the Sites, you accept the terms of this Privacy Policy and our Terms of Service, confirm that you are not located outside the United States, and consent to our collection, use, disclosure and retention of your information as described in this Privacy Policy. We currently only accept business and Site visitors within the United States.

1. INFORMATION WE COLLECT

Allure collects Personal Information from you, which may include information you provide to us and information that is automatically collected about your computer hardware and software and how you use the Sites when you access the Sites.

Information You Provide

- **Where you contact us:** If you contact us via the Sites, we may collect your name, e-mail address, telephone number, address and any additional information you provide when you contact us.
- **Where you register with Allure as a resident:** If you are a resident of any of our communities, you may register to access the community resident portal on our Sites. To register, you may be required to provide your name, e-mail address, telephone number, password and a security question and answer. Once you are registered, you may make

payments, check the status of your payments, review your payment history and submit maintenance requests online. Accordingly, we may collect your name, financial information (e.g., credit or debit card number), e-mail address, telephone number, address and description of the maintenance issue.

- **When you register to apply to become a resident:** When you register to submit an application to become a resident at any of our communities, we may require you to provide your name, e-mail address, password, telephone number and date of birth.
- **When you schedule a tour:** If you sign up to schedule a tour of any of our communities, we may require you to provide your relationship to the future resident, name, e-mail address, telephone number, address, and any additional information you may provide to us related to the tour.

Information Collected Automatically

As you navigate a Site, the Site may also automatically collect information about your computer hardware and software and how you use the Site through the use of commonly used information-gathering tools, such as cookies and web beacons (collectively “Website Navigational Information”). Website Navigational Information may include your Internet Protocol (“IP”) address, type of operating system, browser type, device type, language preference, the time and date you accessed the Site, Internet service provider, search queries, geographic location, referring website addresses, browsing history, other technical information such as protocol status and sub-status, bytes sent and received, and server information, and the actions you take on a Site (such as the web pages viewed and the links clicked).

- **Cookies:** Like many companies, we may use cookies on a Site. A cookie is a small file containing a string of characters that is sent to your computer when you visit a website or use an online service. When you visit the website or use the online service again, the cookie allows that website or online service to recognize your browser or device. Cookies may store unique identifiers, user preferences and other information. We may use the following cookies on the Sites:
 - **Essential Cookies.** These cookies are strictly necessary to provide you with services available through our Sites and to use some of the Sites’ features, such as access to secure areas.
 - **Performance and Functionality Cookies.** These cookies are used to enhance the performance and functionality of our Sites; to manage your preferences; to analyze and personalize your use of, or to generally help us better understand how our Sites are being used. We think that these cookies will improve your experience when using the Sites but are not essential. However, without these cookies, certain functionality may become unavailable.
 - **Targeting/Advertising Cookies.** These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting advertisements that are based on your interests.

Web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to manage and delete cookies, visit www.allaboutcookies.org. Some web browsers provide settings that allow a user to reject cookies or to alert a user when a cookie is placed on the user's computer, tablet or mobile device. Most mobile devices also offer settings to reject mobile device identifiers. Although users are not required to accept cookies or mobile device identifiers, as mentioned above, blocking or rejecting them may prevent access to some features available through the Sites. You may manage your cookie preferences by visiting our cookie management tool on the Sites here.

- **Web Beacons:** A Site may also use web beacons (including web beacons supplied or provided by third parties) alone or in conjunction with cookies to compile information about users' usage of a Site and interaction with e-mails from Allure. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Site tied to the web beacon, and a description of a Site tied to the web beacon. We use web beacons to operate and improve the Sites and e-mail communications. We may use information from web beacons in combination with other data we have about you to provide you with information about Allure and our services.
- Some or all of the Sites may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how users use the Sites. The information generated by the cookie about your use of a Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. This information is then used by us to evaluate visitors' use of the Sites and to compile statistical reports on Site activity for Allure. If you would like to opt-out from the use of your information by Google Analytics, you may use [Google Analytics' opt-out browser add-on](#) designed for this purpose.

2. INTEREST-BASED ADVERTISING

We may collect information about your online activities on our Sites to provide you with advertising about products tailored to your individual interests. We also may obtain information for this purpose from third-party websites on which our advertisements are served.

You may see certain advertisements on other websites because we work with advertising partners (including advertising networks) to engage in remarketing and retargeting activities. Our advertising partners allow us to target our messaging to users through demographic, interest-based and contextual means. These partners track your online activities over time and across websites, including our Sites, by collecting information through automated means, including through the use of third-party cookies, web server logs and web beacons. They use this information to show you advertisements that may be tailored to your individual interests. The information our advertising partners may collect includes data about your visits to websites that participate in the relevant advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our Sites and on third-party websites that participate in the ad networks. This process also helps us track the

effectiveness of our marketing efforts. For example, we utilize certain of our advertising partners' targeted advertising services to show you our advertisements on other websites based on your prior visits to our Sites and other online activity.

Provided that a company participates in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising, you may opt out of interest-based advertising generally through the Network Advertising Initiative website or by visiting <http://www.aboutads.info/choices/> (web-based advertising) or <http://www.aboutads.info/appchoices> (for mobile advertising). To learn more, please visit the websites operated by the Network Advertising Initiative and Digital Advertising Alliance at www.networkadvertising.org/choices. Opting-out does not mean that you will stop receiving advertisements from us. It means that you still stop receiving advertisements from us that have been targeted to you based on your visits and browsing activity across websites over time.

3. PURPOSE FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Allure collects, uses and discloses your Personal Information in its normal course of business for the following purposes:

- To provide the Site to you and to improve the Site;
- To create and manage your account with Allure;
- To operate, improve and personalize the services we offer, and to give each user a more consistent and personalized experience when interacting with us;
- To personalize our advertising and marketing communications, and to deliver promotions and offers to you that we think may interest you;
- If you sign up for our email list or to receive promotional text messages, to send you emails or text messages about our communities, services or other offers that we think might be of interest to you;
- Establishing and maintaining communications with you;
- Where you have requested information from Allure, assisting you in the completion of your request and the assessment of your eligibility for any such request;
- Responding to your inquiries about Allure's communities or services;
- Allowing Allure to notify you of our communities and/or services we offer;
- To process your payments;
- To fulfill your maintenance requests;
- To schedule tours of our communities;
- For security, to detect fraud, suspicious or other illegal activities, and for archival and backup purposes in connection with the provision of the Sites;
- For our business purposes, such as identifying Site usage trends, compiling statistics for analysis of the Sites and our business, audits, enhancing our Site, improving our services, and determining the effectiveness of our promotional campaigns;
- As we believe to be necessary or appropriate: (i) under applicable law; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities; (iv) to enforce this Privacy Policy and our Terms of Service; (v) to protect our operations;

- (vi) to protect our and your rights, privacy, safety or property, and/or that of others; and
- (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

4. DISCLOSURE OF INFORMATION TO OTHERS

We may disclose your information to the following third parties:

- **With Third Party Service Providers Performing Services on Our Behalf.** We share your information with our service providers to perform the functions for which we engage them. For example, we may use third parties to host the Site or assist us in providing functionality on the Site, provide data analytics on the Site, send out marketing or informational materials and to process payments.
- **For Legal Purposes.** We also may share information that we collect from users as needed to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose personal information as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share personal information as required to pursue available remedies or limit damages we may sustain.
- **Changes of Control.** We reserve the right to transfer or assign the information that we have collected from users in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Allure does not share your personal information with third parties for those third parties' direct marketing purposes.

5. LINKS TO EXTERNAL WEBSITES AND ONLINE SERVICES

Our Sites may contain links to third-party websites and online services. Any access to and use of such third-party websites and online services is not governed by this Privacy Policy but is instead governed by the privacy policies of those third-party websites and online services, and we are not responsible for the information practices of such third-party websites and online services.

6. CONSENT TO RECEIVE COMMUNICATIONS

By providing your phone number and clicking submit online, you agree to our Terms of Service and this Privacy Policy, and authorize us to make or initiate sales calls, text messages and prerecorded voicemails to that phone number using an automated system. Your agreement is not a condition of purchasing any property, goods or services and you may elect to do business with us over the phone. Message & data rates may apply, and message frequency may vary.

7. YOUR RIGHTS AND CHOICES

You may opt out of receiving promotional e-mails and text messages from us by following the unsubscribe instructions provided in any such messages. Please note that if you opt out of receiving promotional messages from us, this does not impact other transactional and administrative messages which you will continue to receive (such as emails relating to billing and payment information or changes to this Privacy Policy). You may also access or modify your information and modify your communication preferences through your account.

8. NEVADA RESIDENTS

Under Nevada law, Allure does not sell your personal information. However, if you are a Nevada resident, you may submit a request that we not sell any personal information we have collected about you by contacting us at info@allurelife.com.

9. TEXAS RESIDENTS

The categories of Personal Information we process about you is set forth in Section 1 (Information We Collect) above. Please note we do not process any “sensitive data” (as such term is defined under Texas law) about you. The purposes for processing such Personal Information are set forth in Section 3 (Purpose for Collection, Use and Disclosure of Personal Information) above. We disclose the Personal Information we process about you set forth in Section 1 (Information We Collect) above with the third parties set forth in Section 4 (Disclosure of Information to Others) above.

If you are a Texas resident, you have the rights to:

- Confirm whether or not we are processing your Personal Information and access such Personal Information;
- Correct inaccuracies in your Personal Information, taking into account the nature of the Personal Information and the purposes of the processing of your Personal Information;
- Delete Personal Information provided by or obtained about you;
- Obtain a copy of your Personal Information we process, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance, where the processing is carried out by automated means; and
- Opt out of the processing of Personal Information for purposes of:
 - Targeted advertising;
 - The sale of Personal Information; or
 - Profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. We do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

You may exercise these rights by contacting us at www.allurelife.com, info@allurelife.com, or via toll-free number 1-855-434-2233.

Only you may make a verifiable request related to your personal information. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We reserve the right to verify your identity in connection with any requests regarding Personal Information to help ensure that we provide the information we maintain to the individuals to whom it pertains and allow only those individuals to exercise rights with respect to that information. 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 the event we deny your request, you may appeal our denial by contacting us in the same manner by which you submitted your request.

We process your Personal Information for the purposes of targeted advertising, and under Texas law, our processing may qualify as a “sale”. We share your Internet activity, as described in Sections 1 (Information We Collect) and 2 (Interest-Based Advertising) with our third-party website analytics and digital advertising service providers. To opt-out of such sharing of information with our third-party website analytics and digital advertising service providers, please visit our cookie management tool here. If you are an authorized agent making a request to opt-out on behalf of a consumer, we may require and request that you provide us with written permission signed by the consumer to verify that you are authorized to make such request.

10. DO NOT TRACK

Our Sites do not currently take any action when it receives a Do Not Track request. Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on Do Not Track, visit www.donottrack.us.

11. CHILDREN

We do not knowingly collect or maintain personal information from any person under the age of 13. No parts of our Sites are directed to or designed to attract anyone under the age of 13.

12. SAFEGUARDS

Allure uses reasonable security measures designed to prevent unauthorized intrusion to the Sites and the alteration, acquisition or misuse of personal information. However, please note that no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. It is your responsibility to protect the security of your login information.

13. CHANGES TO THIS PRIVACY POLICY

Any changes to our Privacy Policy will be posted to this page so users are always aware of the information we collect and how we use it. Accordingly, please refer back to this Privacy Policy frequently as it may change.

If there is any material change to your rights under this Privacy Policy, Allure will provide you with notice of such change 30 calendar days prior to the changes going into effect. As part of this notice, Allure may post a notice of the change on the Sites in a clear and conspicuous manner for the 30-calendar day notice period. Allure may also communicate the change via email or postal mail if this is the way that Allure normally corresponds with you. Please note that your continued use of a Site once this 30-calendar day period is over indicates your agreement to the changes which were the subject of the notice.

14. QUESTIONS

If you have any questions or concerns about this Privacy Policy, please let us know by sending an email or writing to us at:

Allure Lifestyle Communities
170 N Radnor Chester Rd Suite 250
Radnor, PA 19087

info@allurelife.com