StoneCreek Communities ("StoneCreek," "we," "us," or "our") respects your privacy and is committed to protecting it through our compliance with this Privacy Policy ("Policy"). We adopt this Policy to comply with data privacy laws applicable to StoneCreek, including the California Consumer Privacy Act of 2018 ("CCPA"), the Virginia Consumer Data Protection Act ("VCDPA"), and the Connecticut Data Privacy Act ("CTDPA"). Terms used but not defined in this Policy shall have the meanings given to them under the CCPA and/or other applicable privacy laws.

Please read this Policy carefully to understand our policies and practices regarding your personal information and how we will treat it. By accessing or using our Websites (defined below) and our services, you agree to be bound by the terms set forth in this Policy. This Policy may change from time to time. Your continued use of this Website and our services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

# INTRODUCTION

This Policy applies to our practices of collecting, using, maintaining, selling, and disclosing personal information:

- Through our websites, [invalid URL removed] and our other individual property websites where this Policy is posted (our "Websites"), and any email, text, and other electronic messages between you and this Website, and when you interact with our advertising and mobile applications on third-party websites, if those applications, sites, or advertising include links to this Policy.
- Through our offline practices and any products and services we provide. This Policy refers to our Website and offline practices collectively as our "services."
- Of former, current, and prospective residents; customers; vendors; B2B contacts; officers, owners, directors, contractors, beneficiaries, emergency contacts, former employees, current employees, and job applicants.

Our collection, use, disclosure, and processing of personal information about individuals will vary depending upon the circumstances and our relationship to such individual. This Policy is intended to describe our overall privacy and data protection practices. This Policy also describes the rights of individuals regarding their personal information, which may vary depending on the individual's state of residency. The descriptions below regarding our collection, use, and disclosure of your information apply equally regardless of our relationship with you unless noted otherwise. StoneCreek's website may include links to third party websites, services, and applications. These links are provided solely as a convenience to you and are not an endorsement of the content of such sites. This Policy does not apply to those sites, as we have no control over or responsibility for third parties' collection or use of your information. These third party sites may have their own privacy policies that you should review.

# PERSONAL INFORMATION OF MINORS

Our Sites are not directed to minors under the age of 16 and we do not knowingly collect Personal Information from minors. We may collect Personal Information of minors, provided by parents or guardians, in connection with the application and rental of a unit, or the provision of property management services. We do not sell the Personal Information of minors. If you believe we might have any information from or about a child under sixteen (16), please contact us at website@stonecreekliving.com.

# YOUR CONSENT AND CHANGES TO THE POLICY

By using the Site or App, you consent to the collection, use, and disclosure of information as described in this Policy. We may update this Policy from time to time. We will post any changes on this webpage. Your continued use of the Site or App after such changes signifies your acceptance of the updated Policy.

# TYPES OF INFORMATION COLLECTED

We collect, process and store various types of Personal Information. For purposes of this Policy, "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include de-identified or aggregate information, or public information lawfully available from governmental records.

Personal Information we collect may include: your name, email addresses, postal addresses, postal codes, user Internet Protocol (IP) addresses, social security/insurance number, driver's license number, prior addresses, monthly rent paid at prior residences, employers, job titles, income, telephone numbers, credit card information, bank account information and routing numbers, date of birth, gender, age, marital status, user name and password (if you choose to become a registered user of the Site or our products and services), emergency contact information, information about your pets, information about your vehicles including license plate numbers, biometric information or biometric identifiers (if you choose to schedule a self-guided tour and/or use our identity verification services), when a smart device is on or off; when a door is locked, unlocked, opened, or closed; the unit with which the door is associated (if you choose to use Smart Home or the Home IQ Device(s) or Home IQ Hub), and other information either desirable or necessary to provide quality services to our residents and visitors. We may also collect information about you such as your use of the Site and communication preferences.

Your Personal Information may be retained for as long as you use the Site or our products and services. Retention periods may be extended if we are required to preserve your personal information because of litigation, investigations and other similar proceedings, or if a longer retention period is required or permitted by applicable law.

We do not and will not sell your Personal Information.

Additional Information about How We Collect and Share your Personal Information

With respect to each of the categories of data above, we may also collect and share Personal Information with third parties to comply with legal obligations; when we believe in good faith that an applicable law requires it; at the request of governmental authorities or other third parties conducting an investigation; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; with contracted service providers; or otherwise to protect the rights, property, safety, or security of our business, third parties, visitors to our websites and mobile apps, or the public. With respect to biometric information or biometric identifiers, we may disclose such data to our technology service providers for the purpose of verifying your identity. We may also share Personal Information with any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

# PERSONAL INFORMATION WE WILL CONTINUE TO COLLECT

We will continue to collect the same categories of Personal Information listed above, for the same purposes.

# USE OF COOKIES AND OTHER TECHNOLOGIES

Like many other website operators, Company may use cookies to customize content specific to your interests and track your use of the Site. "Cookies" are text files that are placed on your computer and may be used to store your personal information. In addition to cookies, Company may use other now known or later developed technologies, to assist Company in observing the behavior of users visiting the Site. These technologies access individual user information but the information is used only to compile aggregated statistics about the Site's usage.

This Site uses Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. ("Google"), to better assist Company in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer's IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Site, compiling reports on Site activity for Company's use, and providing other services relating to Site activity and usage. 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. The use of cookies by Google Analytics is covered by Google's privacy policy: <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a>.

You can choose to delete existing cookies, allow or block all cookies, and set preferences for certain websites in your browser's settings. Please note you may not be able to use the full functionality of the Site if you choose to block all cookies.

The Site may use Google Analytics to understand user behavior. You can choose to disable cookies in your browser settings.

#### HOW WE COLLECT AND USE INFORMATION

We may collect information in several ways by your use of this Site, as well as from forms you submit to us, personal correspondence, such as emails or letters that you send to us, information you include in an application you complete on the Site, information you provide when scheduling a property visit through the Site, or any other activity through which you identify yourself to us. When you visit the Site, our servers may log your IP address, the URL of your request and other information that is provided in the HTTP header. We may also ask you to voluntarily provide us with personal information on this Site. For example, while many of the features of the Site are available without registering, you may be asked to create an account on the Site if you desire to access certain features. Further, in some instances, we may ask you to provide personal information in order to perform screening services. Although you may decline to voluntarily provide Personally Identifiable Information when asked, some features, products and services will be unavailable to you as a result. Company may use the information collected from you to provide services which you have requested from us, including, without limitation, enabling you to use the Resident Portal. We may also use your personal information to send you targeted messages, publications, news, and information about events, special offers, promotions and benefits.

### EMAIL AND TEXT MANAGEMENT

You may receive emails and texts from Company for a variety of reasons. We respect your desire to manage email and text correspondence. If you have an account with Company on the Site, you can select your preferences through your account settings. You can also manage your receipt of certain types of communication by following the instructions included in the email we send you. Please note that, even if you unsubscribe from certain email correspondences, we may still need to email you with information relating to your unit, the management of the property, and other important transactional or administrative information.

# SHARING OF INFORMATION COLLECTED

Except as set forth in this Privacy Policy or as specifically agreed to by you, we will not disclose any information we gather from you on our Site.

We may share with third parties, including, without limitation, our corporate partners, aggregated demographic and statistical information that is not personally identifiable.

Company may also disclose an individual's personal information:

- to a person who in the reasonable judgment of Company is seeking the information as an agent of the individual;
- in situations where sharing or disclosing your information is required in order to offer you products or services you desire;
- to a third party or parties, where disclosure is required or permitted by law, a judicial proceeding, a criminal investigation, a court order, or legal process;
- if, in the reasonable judgment of Company, it is necessary to enforce compliance with our internal policies or the Terms of Use, to prevent illegal activity or suspected fraud, or to protect our Site, customers, or others; and
- to any other entity that acquires all or a portion of our organization by merger, reorganization, operation of law, or a sale of some or all of Company's assets.

#### **NOTIFICATION OF CHANGES**

If we decide to change our privacy policy, we will post those changes on www.homeisjchart.com so our users are always aware of what information we collect, how we use it and under what circumstances, if any, we disclose it.

#### **CALIFORNIA RESIDENTS' RIGHTS**

The California Consumer Privacy Act (CCPA) may apply to California residents whose Personal Information is collected by landlords of a certain size or that meet other criteria. If the CCPA applies to us, California residents may request to know about Personal Information collected about them and request deletion of that Personal Information. These rights are subject to certain exceptions, including without limitation, for Personal Information subject to the Fair Credit Reporting Act and the Gramm-Leach-Bliley Act. If we are subject to the CCPA, you can learn more about these rights and our processes for consumer requests by contacting us using one of the methods listed below. If you exercise any of the rights afforded to you by the CCPA, we will continue to treat you fairly.

Right to request disclosure of information we have collected about you

If the CCPA applies to us and to your information, you can submit a request to us for the following personal information we have collected:

- The categories of personal information we've collected about you.
- The categories of sources from which we collected the personal information.
- The business or commercial purposes for which we collected or sold the personal information.
- The categories of third parties with which we shared the personal information.
- The specific pieces of personal information we collected about you.
- The categories of personal information (if any) that we have sold about you, the categories of third parties to which we sold that information, and the category or categories of personal information sold to each third party.
- The categories of personal information that we disclosed about you for a business purpose.

Our responses to any of these requests will cover the 12-month period preceding our receipt of the request.

# Right to request the deletion of personal information we have collected from you

Upon request, we will delete the personal information we have collected about you that is covered by the CCPA, unless a relevant exception to the right to deletion applies.

#### **RIGHTS OF INDIVIDUALS**

Site users who wish to correct, update, change, or erase the information they submit on the Site should be able to go back to the applicable web form or their account to edit their user or organization record. For additional information or problems accessing your information from such page, please contact Company using one of the methods listed below. If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country.

#### DO NOT TRACK

"Do Not Track" is a privacy preference that users can set in certain web browsers. We do not respond to browser or do not track signals.

#### ACCESSIBILITY

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us using one of the methods below.

#### ACCEPTABLE US

You agree you will not modify, tamper with, reverse engineer, decompile, or otherwise attempt to discover the source code for, any Site or related hardware or software associated with the Site.

### CONTACT US

For questions about this Policy or your information, contact us at:

Phone: 314-339-6104 Email: <u>website@stonecreekliving.com</u> Mail: Attention: Privacy Policy, 1734 Clarkson Road | Suite 160 | St. Louis, MO 63017

# CANADA

To the extent it is applicable, this policy is made under the Personal Information Protection and Electronic Documents Act. There are some rare exceptions to the commitments set out above. For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

Address: 112 Kent Street, Ottawa, ON K1A 1H3 Phone: (613) 995-8210 Toll-free: (800) 282-1376 Facsimile: (613) 947-6850 TTY: (613) 992-9190 Website: www.priv.gc.ca/en/