

PRIVACY POLICY

Effective Date: January 8, 2019

Last Updated: June 30, 2023

The Privacy Policy describes how The CONAM Group of Companies and its affiliated entities (“CONAM,” “Company,” “our,” “we,” and “us”) process personal information about you. This Privacy Policy applies when you visit or use <https://www.conam.com> and any associated URLs owned or controlled by CONAM (collectively, “Website”), access or use our mobile applications (“Apps” and together with the Website, the “Sites”), contact our customer service team, apply to or become a member of our apartment communities, invest with us, engage with us on social media, communicate with us, apply for a job with us, purchase or use our products or services, or otherwise interact with us. It also applies to personal information we collect in your capacity as an employee or contractor of CONAM.

If you have any questions, please contact us as provided below. You may download a copy of this Privacy Policy by clicking here. If you have a disability and need to receive this Privacy Policy in a different format, please contact us at (833) 683-3373.

Please read this Privacy Policy carefully to understand our policies and practices. By using the Sites or providing your personal information to CONAM, you signify that you consent to the use of your information in accordance with this Privacy Policy. If you do not agree with any term in this Privacy Policy, you should not access and use the Website or Apps and please do not otherwise provide us with any personal information.

Contents

- Categories of Personal Information We Collect**
- Sources Of Personal Information**
- Purposes for Collecting Personal Information**
- How We Disclose Personal Information**
- We Combine Information**
- Sensitive Personal Information**
- How Long We Keep Personal Information**
- Cookies, Analytics, and Other Tracking Technology**
- Links to Other Websites**
- Security**
- This Website is Not Intended for Children**
- Marketing Communications**
- Processing in the United States and Canada**
- California Privacy Rights/Notice to California Residents**
- Contact Us**
- Updates to Our Privacy Policy**

Categories of Personal Information We Collect

The type of information that we collect depends on your interaction and relationship with us. We collect, and in the preceding 12 months have collected and processed, the below categories and types of personal information with your consent or as otherwise required or permitted by law.

- **Contact Information.** We collect full name, postal address, email address, current and prior home address, telephone number, and business contact information.
- **Identifiers.** We collect social security number, driver's license number, military ID number, passport number, state identification card number, I-9 documentation, tax or national identification number, internet protocol address, account usernames and passwords, signature, and social media user names.
- **Personal Characteristics or Traits.** We collect date of birth, gender, age, nationality, racial or ethnic origin, religion, marital status, citizenship status, military or veteran status and disability information.
- **Financial Information.** We collect tax identification number, financial or bank account information, tax-related information, wire instructions, credit check information, payment card number, payment card expiration date and CVV code, and billing address.
- **Commercial Information.** We collect records of products or services purchased, obtained, or considered and purchasing histories.
- **Internet or Electronic Usage Data.** We collect data related to network and website interaction history, IP address, website cookie information, interaction with advertisements and browsing time.
- **Audio/Visual Data.** We collect audio, electronic, photographic, visual or similar data including videos, photographs, or audio recording.
- **Geolocation Data.** We collect geolocation data including the general region or area from which you access our Sites. If you are employed by us and you use a Company-issued phone, we may also track that phone if it is lost or stolen.
- **Biometric Information.** If you are employed by us, you may choose to provide our third-party vendors with characteristics about you that can be used to establish your identity and location. For example, if you use Microsoft Authenticator to log-into our systems and select facial recognition as your method of authentication, Microsoft may collect your faceprint. While the processing of your personal information is governed by this Privacy Policy, we do not receive a copy of your faceprint from Microsoft.
- **Professional or Employment Information.** We collect job application details, previous work history, salary wage expectation, reference information, background check results, drug test results, professional memberships and certifications, personnel number, job title role, office location, company entity, compensation and bonus data, benefits data, dependency information, emergency contact information, health insurance information such as your policy number and spouse or dependent information, beneficiary information, time tracking, absence and annual leave, travel booking details, business contact details, expense details, performance rating, records of disciplinary action, health and safety related information, workers compensation claims, grievances and complaints, exit interview and comments, and reasons for termination. To the extent permitted and required by applicable laws, we may collect information about your medical and treatment history, diagnosis, dates of service, provider name, and your ability to work.
- **Education Information.** We collect education history, degrees, transcripts, qualifications and certifications.
- **Sensitive Information.** We may collect social security number, driver's license number, passport number, state identification card number, racial or ethnic origin, religious or philosophical beliefs, or union membership, and health information.

- **Inferences:** We use information from the categories of personal information described above in order to create a profile about you, to reflect your preferences, characters, behavior and attitude.

Sources Of Personal Information

We collect, and in the preceding 12 months have collected, personal information in the following ways:

- **Directly from you.** We collect contact information, identifiers, personal characteristics or traits, financial information, commercial information, audio/visual data, professional or employment information, education information, and sensitive information that you provide directly to us.
- **When you visit our locations.** When you visit our offices or facilities, we also collect contact information and audio/visual data.
- **Automatically.** When you access our Sites, we collect identifiers, geolocation data, and internet or electronic usage data using tools like browser cookies.
- **From third parties:** We may collect contact information, identifiers, personal characteristics or traits, commercial information, audio/visual data, professional or employment information, and education information, from third-parties including our vendors, clients, recruiters, suppliers, service providers.
- **From our employees or job applicants.** We collect contact information, identifiers, personal characteristics or traits, financial information, commercial information, audio/visual data, professional or employment information, education information, and sensitive information from our current or former job applicants, contractors and employees.
- **Social media platforms.** Depending on the information you choose to share and your privacy settings, we may collect contact information, identifiers, audio/visual data, personal characteristics or traits, geolocation data, commercial information, professional or employment information, internet or electronic usage data, and inferences. Based on the way you have set your privacy settings on your social media accounts, most social media platforms, like Facebook and Instagram, analyze data about how you interact with our Sites and combine it with information on other users to provide us information about you. In addition, we may receive information about you if other users interact with us on social media and information about you is visible to us, for example the fact that you are “friends” or other public-facing profile information.

Purposes for Collecting Personal Information

We use personal information for the following business and commercial purposes:

- **Providing our Products and Services.** We use contact information, identifiers, financial information, commercial information, professional or employment information, and education information to allow clients to apply for and contract for and purchase our products and services, invest with us, apply to or become a member of one of our apartment communities. We also use this information to assess your suitability as a tenant or investor, provide the services we have contracted for, process payments, and provide updates and reports.

- **Transactional Purposes.** We use contact information, identifiers, financial information, professional or employment information, and commercial information to: (i) communicate with you; (ii) provide you with customer assistance; (iii) administer contracts with our vendors, clients, and service providers; and (iv) provide supporting business activities such as billing and collections, procurement, and tax related activities.
- **Recruiting and Hiring.** We use contact information, identifiers, audio/visual data, professional or employment information, education information, financial information, sensitive personal information, and inferences make informed decisions on recruitment and assess your suitability for the role, communicate with you about your application, respond to your inquiries and schedule interviews, and to reimburse you for any agreed expenses incurred in the application process.
- **Employment Purposes.** We use contact information, identifiers, personal characteristics or traits, financial information, audio/visual data, professional or employment information, education information, biometric information, sensitive information, and inferences to administer all aspects of our employment or contractor relationship with you. For example, we use the information to complete new hire paperwork, enroll you in our human resource management system, conduct background checks, collate company directories and provide communication services, provide you access to our offices and IT systems, set up your personnel file, create benefits packages and provide and administer employee benefits, track your time and attendance and absences and to pay you and reimburse you for professional expenses, provide training, conduct performance and talent management activities, and to evaluate and process time off, sick leave, leaves of absence, or accommodation requests.
- **Business Operations.** We use contact information, identifiers, personal characteristics or traits, financial information, audio/visual data, professional or employment information, education information, sensitive information, and inferences for our day-to-day business operations including maintaining records, planning, budgeting, calibration, headcount, database administration, diversity metrics, surveys, evaluations, reports, compliance, regulatory, audit, investigative and disciplinary purposes and other ethics and compliance reporting tools, and to support our business operations.
- **Analytical Purposes.** We use identifiers, internet or electronic usage data, geolocation data, commercial information, and inferences to analyze preferences, trends and statistics.
- **Marketing and Promotional Purposes.** We use contact information, identifiers, financial information, professional or employment information, internet or electronic usage data, geolocation data, and inferences to improve our marketing efforts, conduct market research, prospect for new clients or consultants, engage in client relationship management, client engagement, administering promotions, and to provide you with information about us, including personalized marketing communications.
- **Maintenance and Improvement of our Sites and Systems.** We use identifiers, geolocation data, internet or electronic usage data to improve our Sites and systems, provide and maintain functionality on our Sites and systems, and help us diagnose technical and service problems and administer our Sites and systems. Maintenance of our systems includes activities such as applying security controls for company systems, providing new system implementations, applying change management processes, and providing IT Service Desk / Help Desk Support.

- **Develop and Improve Our Products and Services.** We use contact information, identifiers, financial information, commercial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, inferences, and professional or employment information to help us develop new products and services and to improve and analyze our existing products and service offerings.
- **Security and Fraud Prevention.** We contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to: (i) protect us, our employees, and our Sites, premises, assets, systems, products, services and intellectual property, including from fraud, theft, and misconduct; (ii) enforce our policies and terms; (iii) conduct vendor due diligence; and (iv) detect and prevent fraud, theft and misconduct including by verifying the identity of those we are conducting business with.
- **Legal:** We use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Other Purposes:** We may use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences for other reasons we may describe to you.

How We Disclose Personal Information

We disclose personal information in the following circumstances:

- **Service Providers.** We may share personal information with vendors and service providers who support the operation of our services, website, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting, payment processing, order fulfillment, email delivery, marketing, insurance, operating systems and platforms, transportation, and customer support services). We also provide this information where necessary to our professional service providers such as lawyers, bankers, tax consultants, auditors, and insurers. In some cases, the vendor or service provider may directly collect the information from you on our behalf. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, biometric information, professional or employment information, education information, sensitive information and inferences to our service providers.
- **Property Owners.** We share personal information with property owners when we provide them with property management or investment services. In the past 12 months, we have disclosed contact information, identifiers, financial information, professional or employment information, education information and inferences to our clients.
- **Other Property Managers.** If our property management contract expires, we may disclose personal information, including tenant applications and records and leasing files, to the new property management company or individuals responsible for

property management. In the past 12 months, we have disclosed contact information, identifiers, financial information, commercial information, professional or employment information, education information and inferences to other property managers.

- **Affiliates.** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information and inferences to our affiliates.
- **Analytics/Advertising Partners.** We may share personal information with third party analytics or advertising partners, including social media platforms and networks, who provide analytics or marketing and advertising services to us. In the past 12 months, we have disclosed contact information, identifiers, commercial information, internet or electronic usage data, geolocation data, and inferences to our service providers.
- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies, tax authorities, and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us. In the past 12 months, we have disclosed contact information, identifiers, personal characteristics or traits, financial information, commercial information, professional or employment information, sensitive information and inferences to government entities.
- **Corporate Transactions.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments. We have not disclosed any personal information to corporate transaction recipients in the last 12 months.
- **Other Reasons.** We may disclose personal information for other reasons we may describe to you, including if you consent to the disclosure or direct us to disclose your information.

We Combine Information

We combine information we obtain from different sources with publicly available information, including to create inferences and profiles about you. For example, we may combine information that we have collected offline with information we collect online. We combine information that we have collected across other third party sites. We combine information across devices, such as computers and mobile devices. We may also combine information we get from a third party with information we already have.

Sensitive Personal Information

Unless specifically requested, we ask that you not send us, and you not disclose to us, through the Services or otherwise, any Sensitive Personal Information (e.g., social security number,

taxpayer identification number, passport number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records, or information on other judicial or administrative proceedings).

How Long We Keep Personal Information

We will retain and use your information for as long as we need it to provide you services or products, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Where we process personal information for marketing purposes, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing so that we can respect your request in future. We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data; and
- what the expectation for retention was at the time the data was provided to us.

Cookies, Analytics, and Other Tracking Technology

Cookies and Tracking Technology

We want you to be aware that certain online tools exist to help us serve and recognize you when you visit our website. We receive and store certain types of information when you visit our website. When you access the website, we (including third-party analytics and advertising companies we work with) may place small data files on your computer or other device. These data files may be web beacons, cookies, clear gifs, pixel tags, e-tags, flash cookies, log files, or other local storage provided by your browser or associated applications. These tracking technologies, which are often referred to collectively as cookies, collect information about your use of the Sites and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked and conversion information. We use this information to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your online activity. If you want to remove or block cookies, you may be able to update your browser settings. You can also find instructions on how to manage cookies on different types of web browsers at www.allaboutcookies.org. Please click [here](#) to change your preferences regarding cookies.

Do Not Track Signals

Some web browsers may let you enable a "Do Not Track" feature that sends signals to the Website you visit, indicating you do not want your online activities to be tracked or engaged in other types of data collection. These features are not yet uniform across browsers and as a result

our Website is not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

Google Analytics

We use analytics services provided by Google Analytics. If you would like more information on how Google uses data when you visit or use our Sites, please visit www.google.com/policies/privacy/partners. If you would like to opt-out, Google provides an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

Sharing for Cross-Contextual Behavioral Advertising

You can opt out of the sharing of your personal information for cross-contextual behavioral advertising by clicking Do Not Sell/Share My Personal Information and turning the non-essential cookies to inactive. You can also configure your browser as we describe in this section. Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the “global privacy control.” We will respond to this signal in a frictionless manner. If you configure this setting on your browser, certain features on our site may not work and you will receive less targeted advertising. You will also need to turn the setting on for each browser that you use.

Links to Other Websites

Our Sites may include links to other websites or applications whose privacy practices may differ from ours. If you submit personal information to any of those websites or applications, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit or application that you use.

Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

This Website is Not Intended for Children

Our Sites are not directed to children. We collect and disclose personal information (including name, date of birth, and age) about individuals under the age of 13 if that information is provided by a parent or guardian who applies to or becomes a resident of our rental communities. If you are a parent or guardian and believe we may have otherwise inadvertently collected personal information from your child, please notify us using the contract information below.

Marketing Communications

Marketing Emails. You can opt out of marketing or advertising emails by using the "unsubscribe" link or mechanism noted in communications you receive from us. You may also request to opt out of marketing or advertising emails by contacting us using the form provided at <https://sq1compli.conam.com/sar>. Once we process your request, we will cease using the information for such purposes at no charge to you. If you opt out of getting marketing messages,

you will continue to receive messages from us about your relationship with us where permitted by law.

Phone Calls and Text Messages. If you do not want to receive marketing phone calls or text messages from us, please inform us that you no longer want to receive calls from us when you receive a call from us, or reply STOP to a text message from us. You can also opt-out of telemarketing by contacting us using the form provided at <https://sq1compli.conam.com/sar>.

Processing in the United States

While you may be able to set up an account while located outside the United States, we do not operate outside the United States, in particular we do not operate in the European Union or provide services or products to European Union residents. If you are accessing our Sites or services from outside the United States, please be aware that information we obtain about you will be processed in the United States by our service providers or CONAM. By using the Sites or our services, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

California Privacy Rights

Shine The Light. If you are a California resident, this section applies to you. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third-parties' direct marketing purposes. If you are a California resident and would like to make such a request, please complete the form accessible at <https://sq1compli.conam.com/sar> and include "CA Shine the Light" in the description of your request.

California Consumer Privacy Act.

This section applies to residents of California as required under the California Consumer Privacy Act, including as amended by the California Privacy Rights Act (together, the "CCPA").

Sale or Sharing of Personal Information. In the preceding 12 months, we have "sold" or "shared" (as those terms are defined in the CCPA) the following categories of personal information: identifiers, commercial information, internet or electronic usage data, geolocation data, and inferences. We do not knowingly sell or share the personal information of minors under the age of 16.

Use or Disclosure of Sensitive Personal Information. In the preceding 12 months, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Your Rights Under the CCPA. Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the business or commercial

purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed personal information.

- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete personal information that we have collected from you. We may not delete all of your personal information if one of the exceptions to the CCPA applies.
- You have the right to opt-out of the sale or sharing of your personal information.
- You have the right to direct us to limit the use or disclosure of your sensitive personal information to only the purposes specified in the CCPA.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

Exercising Your Rights. To exercise any of your rights, please complete the form accessible at <https://sq1compli.conam.com/sar> or call us toll free at (833) 683-3373. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us via your request.

Other Consumer Rights Information. Under California Civil Code Section 1789.3, we are required to provide California residents with the following information:

- Unless otherwise expressly stated, this Site is provided without charge.
- To file a complaint regarding this Site or to receive further information regarding use of this website, please complete the form accessible at <https://sq1compli.conam.com/sar>. You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California's Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210.

Removal of Content. If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please complete the form accessible at <https://sq1compli.conam.com/sar> and include a detailed description of the specific content or information. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Contact Us

If you have any questions about this Policy or our data practices, please contact us using the options below.

- Complete the form accessible at <https://sq1compli.conam.com/sar>
- Call us at (833) 683-3373
- Write to us at The CONAM Group of Companies, Attn: Privacy, 3990 Ruffin Road, San Diego, CA 92123

Updates to Our Privacy Policy

From time to time we may change our privacy policy. We will notify you of any material changes to our privacy policy as required by law. We will also post an updated copy on the website where this appears. Please check our website periodically for updates. The “Last Updated” legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on any of our Sites.