

PRIVACY POLICY

Last Updated: 12/08/2023

This Privacy Policy explains how Cornerstone Residential and its subsidiaries and affiliated companies (“Cornerstone Residential,” “we,” or “us”) collects, uses, and discloses information about you. This Privacy Policy applies when you use our websites and other online products and services that link to this Privacy Policy, (collectively, our “*Services*”), submit an application for one of our communities, contact our customer service team, engage with us on social media, or otherwise interact with us (collectively, our “*Services*”).

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website, such as in connection with making material changes to this Privacy Policy. We encourage you to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

If you are a California resident, please see the “**Your California Privacy Rights**” section.

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COLLECTION OF INFORMATION

Information You Provide to Us

We collect information you provide directly to us. For example, you share information directly with us when you create an account, fill out a form, submit a housing application, communicate with us via third-party platforms, participate in a promotion, request customer support, or otherwise communicate with us. The types of personal information we may collect include your name, email address, current and prior home addresses, phone number, professional and employment information, references, and any other information you choose to provide or that is necessary to evaluate your housing application.

Information We Collect Automatically When You Interact with Us

When you access or use our Services or otherwise transact business with us, we automatically collect certain information, including:

- **Activity Information:** We collect information about your activity on our Services, such as when you apply to live in one of our communities, submit a request through the Contact Us form, communicate through our resident portals, or schedule a property tour.
- **Transactional Information:** When you make a purchase or pay your rent, we collect information about the transaction, such as payment details, and the date and location of the transaction.
- **Device and Usage Information:** We collect information about how you access our Services, including data about the device and network you use, such as your hardware model, operating system version, mobile network, IP address, unique device identifiers, browser type, and app version. We also collect information about your activity on our Services, such as access times, pages viewed, links clicked, and the page you visited before navigating to our Services.

- **Information Collected by Cookies and Similar Tracking Technologies:** We (and our service providers) use tracking technologies, such as cookies and web beacons, to collect information about you. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that we use on our Services and in our emails to help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies and how to disable them, see the **Your Choices** section below.

Information We Collect from Other Sources

We obtain information from third-party sources. For example, we may collect information about you from identity verification services, credit bureaus, advertising networks, data analytics providers, financial services providers, property management services, and mailing list providers. Additionally, if you create or log into your property management account, we will have access to certain information from that platform in accordance with the authorization procedures determined by such platform.

Information We Derive

We may derive information or draw inferences about you based on the information we collect. For example, we may make inferences about your location based on your IP address.

USE OF INFORMATION

We use the information we collect to provide you with property management services and housing within our communities. We also use the information we collect to:

- Process your application for one of our communities, schedule a property tour, and determine your eligibility for certain housing programs;
- Process transactions and send you related information, including confirmations, receipts, invoices, customer experience surveys, and other notices related to managing your residence;
- Personalize and improve your experience on our Services;
- Send you technical notices, security alerts, and support and administrative messages;
- Respond to your comments and questions and provide customer service;
- Communicate with you about services, events and apartment vacancies offered by Cornerstone Residential and others and provide news and information that we think will interest you (see the **Your Choices** section below for information about how to opt out of these communications at any time);
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Personalize the advertisements you see on third-party platforms and websites (for more information, see the **Advertising and Analytics** section below);
- Detect, investigate, and prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of Cornerstone Residential and others;
- Debug to identify and repair errors in our Services;
- Comply with our legal and financial obligations; and
- Carry out any other purpose described to you at the time the information was collected.

SHARING OF INFORMATION

We share personal information in the following circumstances or as otherwise described in this policy:

- We share personal information with vendors, service providers, and consultants that need access to personal information in order to perform services for us, such as companies that assist us with web hosting, credit checks, payment processing, fraud prevention, customer service, and marketing and advertising.
- If you submit a review of our communities on a third-party website, we share this information publicly on our Services.

- We may disclose personal information if we believe that disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements.
- We may share personal information if we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of Reliant Property Management, our users, the public, or others.
- We share personal information with our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.
- We may share personal information in connection with, or during negotiations concerning, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.
- Personal information is shared between and among Cornerstone Residential and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership.
- We share personal information with your consent or at your direction.

We also share aggregated or de-identified information that cannot reasonably be used to identify you.

ADVERTISING AND ANALYTICS

We allow others to provide analytics services and serve advertisements on our behalf across the web and in mobile apps. These entities may use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Services 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. This information may be used by Cornerstone Residential and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites, and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices or change your settings using the consent management tool on our Services.

We also work with third parties to serve ads to you as part of customized campaigns on third-party platforms (such as Facebook and Instagram). As part of these ad campaigns, we or the third-party platforms may convert information about you, such as your email address and phone number, into a unique value that can be matched with a user account on these platforms to allow us to learn about your interests and serve you advertising that is customized to your interests. Note that the third-party platforms may offer you choices about whether you see these types of customized ads.

TRANSFER OF INFORMATION TO THE UNITED STATES AND OTHER COUNTRIES

Cornerstone Residential is headquartered in the United States, and we have operations and service providers in the United States and other countries. Therefore, we and our service providers may transfer your personal information to, or store or access it in, jurisdictions that may not provide levels of data protection that are equivalent to those of your home jurisdiction. We will take steps to ensure that your personal information receives an adequate level of protection in the jurisdictions in which we process it.

YOUR CHOICES

Account Information

You may update and correct certain account information at any time by logging into your account or emailing property management at your community. If you wish to delete your account, please contact property management at your community or visit the settings of your account but note that we may retain certain information as required by law or for our legitimate business purposes.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually adjust your browser settings to remove or reject browser cookies. Please note that removing or rejecting cookies could affect the availability and functionality of our Services.

Communications Preferences

You may opt out of receiving emails from Cornerstone Residential by following the instructions in those communications or by managing your communication preferences in your account settings menu. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

YOUR CALIFORNIA PRIVACY RIGHTS

The California Consumer Privacy Act or “CCPA” (Cal. Civ. Code § 1798.100 *et seq.*) affords consumers residing in California certain rights with respect to their personal information. If you are a California resident, this section applies to you.

California Consumer Privacy Act

In the preceding 12 months, we have collected the following categories of personal information: Identifiers, characteristics of protected classifications under California or federal law, Internet or other electronic network activity information, professional or employment-related information, inferences drawn about your preferences, and other categories of personal data that relate to or are reasonably capable of being associated with you. For details about the precise data points we collect and the categories of sources of such collection, please see the **Collection of Information** section above. We collect personal information for the business and commercial purposes described in the **Use of Information** section above. In the preceding 12 months, we have disclosed the following categories of personal information for business purposes to the following categories of recipients:

<i>Category of Personal Information</i>	<i>Categories of Recipients</i>
Identifiers such as a real name, address, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers	Advertising networks, internet service providers, operating systems and platforms, data analytics providers, payment processors, credit bureaus, customer support partners, and other property management providers.
Internet and electronic network activity	Advertising networks, internet service providers, operating systems and platforms, data analytics providers, and customer service partners.
Characteristics of protected classifications under California or federal law	Third-party providers for property management and housing eligibility services.
Inferences drawn about your preferences	Advertising networks, internet service providers, operating systems and platforms, data analytics providers, payment processors, credit bureaus, customer support partners, and other property management providers.

Cornerstone Residential does not sell your personal information.

Subject to certain limitations, you have the right to (1) request to know more about the categories and specific pieces of personal information we collect, use, and disclose, (2) request deletion of your personal information, and (3) not be discriminated against for exercising these rights. You may make these requests by calling (707) 420-7000 or emailing us at info@cornerstonerent.com. We will verify your request by asking you to provide information related to your recent interactions with us, such as information recently provided to us in a housing application. We will not discriminate against you if you exercise your rights under the CCPA.

If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. If you are an authorized agent seeking to make a request, please **contact us**.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at info@cornerstonerent.com or contact someone within your community.

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