

## Privacy Policy

**Purpose.** This privacy policy (the “Policy”) explains how we collect, use, maintain and disclose certain personal information from current and prospective residents and employees. Personal information may be provided to us by you on our Website (the “Site”), by phone, by email, in person or through other means, such as through third-party vendors working with us.

**Personal Information Defined.** As used herein, “personal information” means information by which you can be personally identified and includes a person’s first name or first initial and last name in combination with any one or more of the following items: (a) social security number; (b) driver’s license number or government-issued identification number; (c) bank account number or credit or debit card number in combination with or without any required security code, access code, or password that would permit access to an individual’s financial account; (d) physical or email address; (e) age or date of birth; (f) number of children; (g) education, occupation or employment information; (h) telephone number; (i) real property purchased, leased, or rented by you; or (j) debit card or credit card balance, payment history or information pertaining to your credit, assets, income or liabilities. If you apply for employment with us, personal information may also include your race, background check and drug test results and employment verification and references. Personal information does not include publicly available information that is lawfully made available to the general public from the federal, state or local government.

**Collection and Use of Personal Information.** When you apply to rent an apartment from us and during your residency with us, when you seek to work for us and during your employment with us, we will ask you to disclose certain personal information on your rental or employment application or other documents or areas of the Site. This personal information will be collected, maintained and used by us for legitimate business purposes, including: confirming your identity; determining your eligibility to rent an apartment or suitability for employment when you apply and determining that you continue to meet eligibility/suitability requirements during your lease or employment term with us; completing the leasing process; requesting credit and background check reports in connection with leasing or job applications; processing job applications; contacting you in response to your inquiries, comments and suggestions or when otherwise necessary; tracking use of the Site for internal market research or Site improvement; for special promotions, contests or surveys regarding products and services provided by us, our affiliates or partners; completing transactions on the Site; notifying Site visitors about updates to the Site; providing our third-party service providers with personal information as we believe necessary, as required by law, regulation or as requested by government authorities; in connection with any acquisition, merger, sale or other transfer of any portion of our business or property; for internal business purposes; and for collection of amounts you may owe.

**Protection and Access to Personal Information.** We will keep personal information you provide to us in our files. If you become a resident in our apartment community, we will keep personal information in a resident file. If you do not become a resident, we will keep personal information in a general file. The property owner, property manager and, if applicable, agents and employees of the foregoing, will have access to the files in accordance with this Policy and pursuant to security measures designed to safeguard any personal information. We also reserve the right to disclose personal information for business related reasons to others such as independent contractors, credit reporting agencies, background check reporting agencies, collection agencies or prospective purchasers of the property or their agents and employees as allowed by law.

**Disposal of Records Containing Personal Information.** It is our policy to dispose of business or customer records that contain personal information by shredding, erasing or otherwise destroying physical or electronic media in a manner consistent with this Policy so that it cannot practicably be read or reconstructed. We may do so by contracting with a third party engaged in the business of record destruction.

**Site Usage Information.** We may directly or through our vendors collect information through “cookies.” Cookies are small strings of text sent by our Site to your browser and then stored by your browser on your computer’s hard drive. Cookies help us understand how you use our Site and other linked sites so that we can personalize and improve your experience on our Site. We do not use cookies that store personal information or associate cookie information with personal information you may provide us. Most Web browsers automatically accept cookies, but you may change your browser settings so it won’t accept cookies. In order to create a profile on our Site, you must have your cookies turned on. We may collect anonymous information about the use of our Site, such as the number of visitors, the length and time of their visits, the pages they view, the web browsers they use, and other similar information. Such anonymous data may be used and disclosed by us to third parties to improve our Site and better understand your needs. The security of your personal information is important to us. While our security measures are intended to protect your personal information, the complete security of any transmission over the Web cannot be guaranteed. Our Site may offer links to other sites for your convenience. Such sites may have information, policies and practices different from our Site. We do not control and are not responsible for the privacy policies, practices and/or content of such third-party sites. Please contact such third-party sites directly for information regarding such sites.

**Conflicts.** This Policy has been designed to meet the requirements of applicable law with respect to the adoption of a privacy policy and applicable employment laws. To the extent that such laws conflict with this Policy, we will act in accordance with applicable laws. Nothing contained in this Policy shall constitute a representation or warranty that personal information will not be misplaced, duplicated or stolen and no liability is assumed with respect to any such occurrence.

**Consent, Changes to the Policy.** By using our Site and providing us with personal information, you have consented to our contacting you by email to provide you with information relating to the property you inquired about. You may opt out of any future commercial email messages from us by choosing the link with instructions on how to remove yourself from our email list. Please note that if you are a resident of one of our apartment communities and you opt out of receiving commercial email from us, you will continue to receive email from us regarding operational issues surrounding your apartment, your lease and/or your community. We reserve the right, at any time, to add to, modify or remove portions of this Policy. Please check back to this page periodically to determine if the Policy has been changed. If this Policy is changed, the date listed below will be changed and we will post a notice to that effect on the Site’s home page for at least 30 days after the change. If you have provided us with your email address, we may (but are not required to) send you an email notifying you of the changes. Your continued use of our Site after any changes have been made will constitute acceptance of the revised Policy.