

Cottonwood Residential Privacy Policy **Last Updated: September 14th, 2020**

How Our Privacy Policy Applies

This Privacy Policy (“Privacy Policy”) explains how Cottonwood Residential (“Cottonwood Residential,” “we,” “us,” or “our”) collect, use, and disclose the Personal Information we collect from or about you or which you may provide to us as part of our relationship with you, including when you:

- provide Personal Information through this Site via the Cottonwood Residential website found at <https://www.cottonwoodres.com> or through any residential portal, prospective resident portal or online payment portal (the “Site”);
- provide Personal Information to us offline; and
- provide Personal Information indirectly through third party advertiser sites.

Before visiting our Site or engaging with us, or otherwise providing Personal Information to us, please review this Privacy Policy carefully. If you do not wish to have your Personal Information collected, used or disclosed as set forth in this Privacy Policy, you must refrain from using our Site or disclosing your Personal Information to us.

This Privacy Policy may be revised from time to time, so please revisit this page to remain fully informed of our privacy practices (see “Changes to Privacy Policy” Section below).

Types of Personal Information We Collect

- **We collect Personal Information through the Site.** When you make a payment through the residential portal, we use a third-party payment processor to facilitate any confidential financial information made on our Site through the residential portal. While we do not collect financial information, we do collect information about your payment history and payment information, which we use for accounting purposes and to respond to inquiries, communicate with you about your account, and for other business purposes. We may collect Personal Information directly from you and automatically through our use of cookies and other data collection technologies on our Sites. We may also collect your Personal Information from third-party sources, such as social media platforms, background check providers, credit reporting agencies and bureaus, advertising networks, Internet Listing Services (ILS),, data analytics providers, internet service providers, operating systems and platforms, data brokers and other third parties to whom you may direct us to collect your Personal information. We will treat Personal Information collected from third-party sources in accordance with this Privacy Policy, but we are not responsible or liable for the accuracy of the information provided by third parties or for third-parties’ policies or practices.

The categories of Personal Information that we or our service providers collect from you depend on your interactions and engagement with us. For example:

- **Direct Identifiers**, such as your name, address, date of birth, social security number, drivers’ license number and information, gender, age, IP address, online identifiers, email address, phone number, payment card or financial account numbers and related

information required to process payments, and other similar identifiers. We collect this information to verify your identity and information, screen potential residents, collections activity, communicate with you, process your payments, and provide you with access to your resident portal account.

- **Commercial Information**, such as the property, leases and services purchased from us, real property purchased, rented or leased from others, insurance information, and number of occupants. We collect this information to maintain client records, identify trends in our client relationships, process insurance claims, screen potential residents, collections activity, and conduct business analytics.
- **Internet Activity Information**, such as your browsing history, search history, cookies, browser and device type, and information regarding your interactions with pages you visit on the Sites. We collect this information to understand your use of the Sites and your Account and for targeted marketing and lead management.
- **Professional and Employment-Related Information**, such as information about your current employment, salary, professional degrees and certifications, and educational background. We collect this information to verify your identity, perform background and regulatory compliance checks, and other related processes.
- **Profile Information**, such as information about your preferences and characteristics. We collect this information in order to understand your preferences and tailor our services and communications to you.

How We Use and Disclose Personal Information

In addition to the purposes for collection described above, we also collect each category of information for the purpose of maintaining our client relationship with you and performing services, which include:

- Onboarding you as a client, maintaining or servicing your account, processing and fulfilling your requests, and other activities that are part of our property, leasing and service offerings;
- Conducting verification and background checks as part of our business acceptance, finance, administration and marketing processes, including anti-money laundering, conflict, reputational and financial checks;
- Taking steps to improve our provision of property, leasing and services to you, including to run analytics, improve our tools, assess the quality of our services, and for other related internal business purposes;
- Confirming your balance, payment history, information pertaining to your creditworthiness, assets, income or liabilities, and managing other aspects of your financial transactions, which includes requesting a credit report in connection with leasing applications;
- Sending you messages promoting our property leasing products and services. You may opt-out of receiving certain promotional e-mail messages from us as described in the “Opt-out” section below;
- Administering and improving our Sites, including to measure the effectiveness of the Sites, to customize the content and/or layout of our Site, to help diagnose problems with our server, to understand where Site traffic is coming from, to identify our Site users, to track our visitors’ use of the Site for internal market research and to notify visitors about updates to the Sites or services;
- Complying with our legal, regulatory and risk management obligations, including establishing, exercising and/or defending legal claims;

- To protect the safety and security of our residents, visitors and staff, our Site, our property or the property of others;
- Fulfilling any other purpose described in our agreements with you;
- To complete the leasing process;
- To contact you in response to your inquiries, comments and suggestions;
- To communicate with you;
- To assist with management of your amenities and utilities, as listed in your lease;
- For the specific purpose for which it was volunteered (for example, to receive notice from us, etc.);
- To improve the services Cottonwood Residential promotes or provides through the Site or through other means;
- For special promotions, contests or survey registrations;
- To ask for your participation in surveys and to provide the results thereof;
- To process your responses to surveys, questions, or other requests;
- To complete any purchases, payments, or other transactions you may perform at the Site;
- To notify you about promotions, special offers, etc., regarding products and services provided by us or our affiliates or partners;
- For our internal business purposes; and
- As otherwise communicated to you or as reasonably anticipated by you

How We Share Your Personal Information

We may share your Personal Information as follows:

- **Service Providers:** We may provide your Personal Information to our services providers that help us run and manage our business, such as technology service providers, analytics providers, utility providers, screening companies, rental insurance companies, collections agencies, customer service providers, and our credit card processors.
- **Property Owners, Property Managers, and Other Subsidiaries or Trusted Affiliates:** We may provide your Personal Information to other third parties with whom we have alliances in connection to providing our products or services, including, without limitation the owner of any property where you may apply or lease and the management company for such property.
- **Other Web Site Providers:** We may provide your Personal Information to other website providers that create additional content for our Site, such as Entrata and Yardi. Where the terms of the privacy policies or terms of use found on Entrata's Web Site or Yardi's Web Site conflict with the terms of our Privacy Policy, the terms of this Privacy Policy shall override. Please see "Links to Third-Party Web Sites" below for more information.
- **Consumer Reporting Agencies:** We may provide your Personal Information to consumer reporting agencies. If you dispute the accuracy of the information provided, you should notify the consumer reporting agency and contact us regarding the dispute. Please see "Contact Information" below for our contact information.
- **Prospective Landlords or Lenders:** We may provide your Personal Information to prospective landlords or lenders, who may request such Personal Information in connection with approval of any rental application or home purchase.
- **As Required By Law:** We may disclose your Personal Information as required by law, such as to comply with a subpoena or similar legal process. Additionally, we may disclose Personal Information when we believe that disclosure is necessary to protect the safety

and security of our residents, visitors and staff and our property or the property of others. We may also disclose Personal Information in order to protect our rights, such as to investigate fraud or respond to a government request.

- **Aggregated and De-Identified Information.** We may share aggregated or de-identified information about users with third parties for marketing, advertising, research or other purposes.
- **Corporate Transaction:** In the event Cottonwood Residential is involved in a merger, reorganization, acquisition or sale of all or a portion of its assets, or other corporate transaction, we may transfer, assign, or disclose your Personal Information as part of that transaction.

Data Collection Technologies

We may use cookies, web beacons, and other technologies (collectively, “Data Collection Technologies”) to help us personalize and enhance Your experience on our Site. Our Data Collection Technologies include:

- **Cookies.** A cookie is a small string of text that is sent by our Site to your browser and then stored by your browser on Your computer’s hard drive. Our cookies allow us to personalize your experience on our Site, make your visit more convenient, and understand how you and others are using our Site so that we can improve your experience on the Site. We use cookies to identify repeat visitors to our Site and to determine the paths visitors take on our Site. We also use cookies to determine whether you visited our Site from a particular Internet link or advertisement. We commonly use conversion cookies to determine the amount of times people who click on ads from our Site also filled out a guest card or signed a lease. Conversion cookie data may be used in combination with your Google account to link conversion events across different devices you use. We do not use conversion cookies for interest-based ad targeting. We do not use any cookies that store personal information or associate cookie information with personal information you may provide us.
- **Web Beacons.** A web beacon (also referred to as clear gif, pixel tag or single-pixel gif) is a transparent graphic image used in tandem with cookies that enables us to record a user’s actions. We use web beacons to count users who have visited those pages, verify system and server integrity and for similar statistical measures.
- **Google Analytics.** We use Google Analytics to help us understand how users engage with our Services. Google Analytics uses cookies to track your interactions with our Services, then collects that information and reports it to us, without identifying individual users. This information helps us improve our Services so that we can better serve users like you. For more information on Google Analytics, visit <https://Support.Google.com/Analytics>.

Most web browsers automatically accept cookies, but it is possible to change your browser setup so that it does not accept cookies. In order to create a profile on our Site you must have your cookies on. To find out more information about cookies, visit <https://www.AllAboutCookies.org>.

Do Not Track Signals

Some web browsers have “Do Not Track” or similar features that allow you to tell each website you visit that you do not want your activities on that website tracked. At present, the Site does not respond to “Do Not Track” signals and consequently, the Site will continue to collect information about you even if your browser’s “Do Not Track” feature is activated.

Data Security

The security of Your Personal Information is importance to us. We use encryption technology to protect data transmitted during the online lease completion process and for online payment of rent. Your browser will indicate when such encryption is activated (e.g., a padlock icon will be shown in Microsoft’s Internet Explorer). No data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts, we cannot guarantee or warrant the security of any information you transmit to us. Except to the extent provided by law, we are not responsible or liable to you for any lack of privacy or security you may experience. You are fully responsible for taking precautions and providing security measures best suited for your situation and intended use of the Sites and our services.

Your California Privacy Rights

We provide California residents the privacy rights required under applicable law, including the California Consumer Privacy Act, as amended (“CCPA”) as further described below.

“Personal Information” under the CCPA is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household, such as your name, email address, IP address, telephone number, and broader categories of information such as your professional, educational, commercial information and internet activity.

California Individual Privacy Rights:

- The right to know. You have the right to request to know (i) the specific pieces of Personal Information we have about you; (ii) the categories of Personal Information we have collected about you in the last 12 months; (iii) the categories of sources from which that Personal Information was collected; (iv) the categories of your Personal Information that we sold or disclosed in the last 12 months; (v) the categories of third parties to whom your Personal Information was sold or disclosed in the last 12 months; and (vi) the purpose for collecting and selling your Personal Information. Generally:
 - Within the preceding 12 months, we have collected the categories of Personal Information detailed in the “Personal Information We Collect” section above.
 - While we may “sell” personal information as defined by the CCPA, we do not sell personal information about California consumers, who we know are younger than 16 years old.
 - We have disclosed the following categories of Personal Information in the preceding 12 months: contact information; professional and employment information; resident information; payment information; lease information; all Personal Information related to the lease and administration of a property; gender; age; IP address; online identifiers; email address; property, leases and services purchased from us; real property purchased, rented or leased from others;

insurance information; browsing history; search history; cookies; browser and device type; information regarding your interactions with pages you visit on the Sites; and information about your preferences and characteristics.

- The right to deletion. You have the right to request that we delete the Personal Information that we have collected or maintain about you. We may deny your request as permitted by law under certain circumstances, such as if we need to comply with our legal obligations or complete a transaction for which your Personal Information was collected. If we deny your request for deletion, we will let you know the reason why such request was denied.
- The right to opt out of the sale of your Personal Information. You have the right to opt out of the sale of your Personal Information, if any. Under the CCPA, a “sale” includes disclosing or making available Personal Information to a third-party in exchange for monetary compensation or other benefits or value. While we do not disclose personal information to third parties in exchange for monetary compensation, we may disclose or make available certain categories of personal information to third parties in order to receive certain benefits or services, such as when we make browsing information available to third party ad companies (through third party tags on our Sites) in order to improve and measure our ad campaigns and reach users with more relevant ads and content. As defined by the CCPA, we may “sell” certain categories of personal information as follows:
 - Usage Data and Identifiers to third party advertising networks and data analytics providers,
 - Customer Records to data brokers,
 - Name, Contact Information and Other Identifiers to third party marketing partners who may contact you about products and services you may be interested in,
- The right to equal service. If you choose to exercise any of these rights, we will not discriminate against you. If you exercise certain rights, understand that you may be unable to use or access certain features of the Sites or our services or properties.

You may exercise your right to know and your right to deletion two-times a year, free of charge. To exercise your right to know or your right to deletion, contact us at **1(877)902-8055** or complete our “California Consumer Request” form available [here](#).

You can opt out of the sale of your personal information [here](#).

We will take steps to verify your identity before processing your request to know or request to delete. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the individual about whom we collected Personal Information. We may request additional information about you so that we can match the information you provide to information we already maintain about you. We will only use the Personal Information provided in the verification process to verify your identity or authority to make a request and to track and document request responses, unless you initially provided the information for another purpose.

You may use an authorized agent to submit a request to know or a request to delete. When we verify your agent’s request, we may verify both your and your agent’s identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on their behalf.

Shine the Light: California Civil Code Section 1798.83 gives California residents the rights to request from us, once per calendar year, certain information regarding our disclosure of their Personal Information to third parties for those third parties' direct marketing purposes. We may share your Personal Information with affiliated third parties, some of which do not share the name of Cottonwood Residential, for their own direct marketing purposes. You may request information regarding the disclosure of your Personal Information to third parties for those third parties' direct marketing purposes by contacting us at Privacy@cottonwoodres.com.

Persons Under 13 Years of Age

This Site is not intended for or directed to persons under 13 years of age. We do not knowingly collect or maintain information at our Site from those we know are under 13, and we do not permit persons under 13 years of age to become registered users of our Site. If we become aware that we have collected information from an individual under 13 years of age, we will immediately delete such information. No part of our Site is structured to attract anyone under 13. By using our Site you represent that you are not under 13 years of age.

Links To Third-Party Web Sites

Our Site may offer links to other Web sites which may have information policies and practices different from ours. We do not control and are not responsible for the privacy policies or practices or the content of any third party Web sites. We encourage you to review the privacy policies of any third part website prior to providing them with your Personal Information.

Changes to the Privacy Policy

We may occasionally update this Privacy Policy to reflect changes in our practices. When we post modifications to this Privacy Policy, we will revise the "Last Updated" date at the top of this web page. We encourage you to periodically review this page for the latest information on our privacy practices.

Email Consent and Opt-Out

Your provision of Personal Information through any of our resident portal Sites constitutes your affirmative consent that we may contact you by email to provide you with information and notices relating to the property where you reside, and various services available to you at or through that property.

You may choose to opt out of receiving future commercial email messages from us. Each mass commercial email sent by us contains a link with instructions on how to remove yourself from our email list. Please note that if you are a resident of Cottonwood Residential 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.

Non-U.S. Residents

The Site is intended for use in the United States of America only. All matters relating to our Site is governed by the laws of the State of Utah in the United States of America. If you visit our Site or contact us from outside of the United States of America, please be advised that (i) any

information you provide to us or that we automatically collect will be transferred to the United States of America; and (ii) that by using our Services or submitting information, you explicitly authorize its transfer to and subsequent processing in the United States of America in accordance with this Privacy Policy. Do not provide your Personal Information to us if you do not want this information to be transferred outside of your country, or if the laws in your country restrict these types of transfers. Your provision of Personal Information to us will be handled in accordance with this Privacy Policy.

Access and Choice

You may access and request modification of the Personal Information we maintain about you by contacting us as described in the “How To Contact Us” below. We will respond to your inquiry within a reasonable timeframe.

How To Contact Us

If you have questions or comments about this Privacy Policy or our privacy practices, please contact us at privacy@cottonwoodres.com or by mail at:

Attn: Privacy Office
Cottonwood Residential
6340 S 3000 E
Suite 500
Salt Lake City, UT 84121