

PRIVACY POLICY

This privacy policy (the "Privacy Policy" or "Policy") of Westminster Management/Westminster Pillar Management ("Company," "we," "us," or "our") describes our privacy practices regarding personal information we collect, including from persons ("you" or "your") who access our property's RentCafe Resident Portal website or our related mobile applications that may be available for download (collectively, the "Site"). To access the Privacy Policy of RentCafe, please visit: <https://www.rentcafe.com/apartments/privacypolicy.aspx>.

PURPOSE. The purpose of this Privacy Policy is to inform you about the types of personal information we gather about you, including personal information gathered when you visit the Site, and personal information we may receive from third parties or affiliates in addition to that online information, how we may use that information, whether we disclose that information to anyone, and the choices you have regarding our use of, and your ability to correct, the information. This Policy does not cover information that is exempted from privacy policy notification requirements, including information about employees, contractors, job applicants and information processed exclusively in the context of a business person acting in a business capacity.

THE SITE IS NOT INTENDED FOR CHILDREN AND COMPANY DOES NOT KNOWINGLY SOLICIT OR COLLECT PERSONAL INFORMATION ON THE SITE FROM CHILDREN UNDER THE AGE OF 13. IF COMPANY LEARNS THAT A CHILD UNDER THE AGE OF 13 HAS SUBMITTED PERSONALLY IDENTIFIABLE INFORMATION TO COMPANY THROUGH THE SITE, IT WILL TAKE REASONABLE MEASURES TO DELETE SUCH INFORMATION FROM ITS RECORDS AND TO NOT USE SUCH INFORMATION FOR ANY PURPOSE (EXCEPT WHERE NECESSARY TO PROTECT THE SAFETY OF THE CHILD OR OTHERS, AS REQUIRED BY LAW, OR AS MAY OTHERWISE BE REQUIRED BY LAW).

YOUR CONSENT AND POLICY CHANGES. PLEASE READ THIS ENTIRE PRIVACY POLICY CAREFULLY. BY USING THE SITE, YOU EXPRESSLY CONSENT, WITHOUT QUALIFICATION, TO THE COLLECTION, USE AND DISCLOSURE OF INFORMATION, INCLUDING PERSONAL INFORMATION, AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, YOU ARE NOT AUTHORIZED TO USE THE SITE.

Company may amend this Privacy Policy from time to time. We will post those changes on the website or update the Privacy Policy date below. In certain cases, you will be notified via email or by a notice on our website.

PERSONAL INFORMATION COLLECTED IN THE PAST 12 MONTHS

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.

Our service providers may use cookies and those cookies may be stored on your computer when you visit our website.

This Site uses Lead Attribution or Marketing Attribution to assess the conversions of different channels that generate leads.

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: <https://www.google.com/policies/privacy/>.

You can choose to delete existing cookies, allow or block 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.

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.

THIRD-PARTY WEBSITES. This Privacy Policy applies solely to information collected by Company. This Privacy Policy does not apply to other websites that are accessible through this Site, including but not limited to any third-party websites.

ACCESSING, REVIEWING AND CHANGING YOUR CONTACT INFORMATION. As an account holder, you can see, review and change most of your contact information associated with your Account Profile by logging into your account and editing your Account Profile. For assistance, you may contact us using one of the methods listed

below. With some exceptions, you have the right to see what Personal Information we hold about you. We can help you identify what records we might have about you. We may need to confirm your identity before providing you with this access, and if we cannot verify your identity with the degree of certainty required, we will not be able to respond to your request. If we cannot give you access, we will tell you within 45 days of receipt of your request and provide you with a reason, as best we can, as to why we cannot give you access.

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.

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.

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 USE. 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.

CONTACTING US.

If you have questions regarding our Privacy Policy or the collection or use of your Personal Information, you can contact us using any of the methods below:

By email at: marketing@wmapts.com

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/

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