Rookwood Properties Privacy Policy

PLEASE NOTE that our PRIVACY POLICY has changed effective January _____, 2017.

This website is owned and operated by Rookwood Properties, Inc. ("Rookwood") as the manager and operator of the rental properties identified on this website. This Privacy Policy governs our data collection and use practices. At Rookwood, we appreciate the trust you have placed in us. Your privacy and security are our top priorities. This Privacy Policy explains what information we collect and how we use it, and under what circumstances we may disclose the information to third parties. This Privacy Policy applies to all visitors to our website, whether as a tenant of, or an applicant to rent, an apartment at one of the properties managed by Rookwood, and anyone else who accesses or uses our services available through this website ("Services"). WHEN YOU ACCESS OUR WEBSITE, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING OUR WEBSITE AND OUR SERVICES.

Information We Collect

Personally Identifiable Information.

When you set up an account with us <u>for our Services</u>, whether to apply for an apartment, or to arrange for automatic rent payment <u>Servicesservices</u>, we collect and store personally identifiable information about you – such as your name, date of birth, address, e-mail address, Social Security number, telephone number, and data associated with your payment method (bank account <u>or credit or debit card</u> information) – as part of the account set-up process. We may also ask you personal identifier questions for purposes of verifying your identification. We may collect transaction and experience information, such as information necessary to any transactions with us, as well as information about our communications with you. We need this information to provide the Services that you request from our website and to let you know of additional Services about which you might be interested.

<u>Non-personally Identifiable Information.</u> We automatically collect certain non-personally identifiable information when you visit our website, such as the following:

- Log data: Our servers automatically record information when you use our website, such as your IP address, the type of browser you are using and its settings, the third party website you visited immediately prior to accessing our website, the operating system you are using, the domain name of your Internet service provider, the search terms you use on our website, the specific website pages you visit, and the duration of your visits.
- <u>Cookie data</u>: Like many websites, we use "cookies" to obtain certain types of information when your web browser accesses our website. "Cookies" are small text files that we transfer to your computer's hard drive or your

Web browser memory to enable our systems to recognize your browser and to provide convenience and other features to you, such as recognizing you as a frequent user of our website. Some of the cookies we use are associated with your account with us (including personal information about you), and other cookies are not.

We may use "session cookies" (cookies that last until you close your browser) or "persistent cookies" (cookies that last until you or your browser delete them). Examples of the information we collect and analyze from cookies include your activity on our website, including the URL you come from and go to next (whether this URL is on our site or not).

If you are concerned about the storage and use of cookies, you may be able to direct your internet browser to notify you and seek approval whenever a cookie is being sent to your Web browser or hard drive. You may also delete a cookie manually from your hard drive through your internet browser or other programs. Please note, however, that some parts of our website will not function properly or be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

 <u>Experience data</u>: We may collect other information that is voluntarily provided by you from time to time if you respond to surveys, polls or questionnaires, and/or website registration forms. Such information may include personal preferences, opinions and experiences with Services, and may be provided anonymously.

Using and Sharing Your Information

<u>With your consent</u>. By using our Services to conduct payment transactions or process applications, you consent to our sharing your personally identifiable information with our partners and affiliates as necessary to complete your payment transaction or application process, or to provide you the Services you have registered for, or to offer additional Services we think you may be interested in. In order to do so, we use the information you provide for the following purposes:

- Provide the Services and tenant support you request
- Process rent payment transactions and send notices about your transactions
- Send you alerts that may help you better manage your residence
- Provide you with fast or automatic payments
- Identify your service preferences

<u>With Third Party Providers.</u> We may disclose information you furnish to selected companies that perform Services for us. All of these companies act on our behalf and are

obligated to keep the information confidential and use it to provide only the Services we have asked them to perform. For example, in order to serve you most efficiently, payment orders are handled by established third-party banking and <u>transaction</u> processing agents. We may employ third parties to process personal information on our behalf for the installation of new software or for security testing of our systems based on our instructions and in compliance with this Privacy Policy. In certain instances we may also share your personally identifiable information with our third party vendors performing functions on our behalf – e.g., provide us marketing or promotional assistance, analyze our data, assist us with customer service, etc. Our third party providers agree to use thisyour information, and we share information with them, only to carry out our requests. Further, we may share your personally identifiable information with third parties such as our co-promotional partners and others with whom we have marketing or other relationships. Under no circumstances will we rent or sell your personally identifiable information.

<u>When we transfer our assets</u>. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the personally identifiable information and non-personally identifiable information we have about you will be transferred to and used by this acquiring entity. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Where required by law. We reserve the right to disclose any personally identifiable or non-personally identifiable information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our website, or other customers; or (d) in an emergency to protect the health and safety of our website's customers or the general public.

How we use email

We will email you to provide you updates on this Privacy Policy or our User Agreement, to process your payments, alert you of messages, and send you payment receipts. We may send you promotions and news about the Services you use or other products and Services we think may be of interest to you. Aside from the foregoing, we will not contact you about any other matters, unless you specifically request it.

How we use cookies and other non-personally identifiable information

We use cookies so your web browser remembers that you have logged in to our website while you use our Services. We also use non-personally identifiable information in a variety of other ways, such as to analyze website traffic (such as aggregated information on the pages visited by our users), which allows us to improve the design and content of our website. We may use your non-personally identifiable information by itself or aggregate it with information we have obtained from others to analyze our products and Services. We may also link your IP address to your personal information but only in the event that there are issues relating to the origin of a payment transaction.

Closing your account

If at any time you choose to discontinue your use of the Services we provide, or we cease providing the Services, or your rental agreement terminates, we will inactivate your account. Any data concerning your past transactions or account activity will no longer be available by use of this website and will be stored in a secure manner. We maintain a backup copy of such data for one year after your last rental payment has been made. Thereafter, the data you have provided in connection with any transactions you complete through use of our Services are securely destroyed.

Updating or Reviewing Your Information

To update your customer information (name, address, telephone number, <u>bankingbank</u> <u>or card</u> information, and email address), please contact us at the address below. A limited amount of transaction history may also be available to you at your request. To protect your privacy and to comply with federal regulations, we will need to verify your identity before you update or review your information.

Children Under 13

We have no way of distinguishing the age of individuals who access our website. The features, programs, promotions and other aspects of our website requiring the submission of personally identifiable information are not intended for children. We do not knowingly collect personally identifiable information from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us please contact us at <u>corpoffice@rookwoodproperties.com</u>. A parent or guardian of a child under the age of 13 may review and request deletion of such child's personally identifiable information as well as prohibit the use thereof.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on secure servers behind firewalls. Any payment transactions, applications, and rental agreements will be encrypted in transit using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

Policy Changes

If our data privacy and information security practices change, we will post these changes on our website and we may notify you by email. We encourage you to review our Privacy Policy periodically. Your continued use of our Services following a change in our privacy practices indicates your consent to those changes.

Contact Us

Contact us if: (a) you have questions or comments about our Privacy Policy; (b) wish to view or make corrections to any personally identifiable information you have provided; (c) wish to change your payment preferences or bank <u>or card</u> account information; (d) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (e) wish to close your account. We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Keep in mind, however, that residual information may remain within our databases, access logs and other records for a limited time, as may be required by applicable laws and regulations, which may or may not contain your personally identifiable information. Please also note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our website. We are always interested in your privacy-related questions or concerns. You may contact us as follows:

Rookwood Properties, Inc. 8160 Corporate Park Drive Cincinnati, Ohio 45242 corpoffice@rookwoodproperties.com

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Document 2 ID	netdocuments://4829-5765-4589/4
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Legend:		
Insertion		
Deletion -		
Moved from		
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Style change		
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Moved deletion		
Inserted cell		
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Split/Merged cell		
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