

# privacy policy

Last Updated: **June 30, 2020**

CRC Property Management LLC (the “Company”) takes your privacy seriously. We want you to know how we collect, use, and share your personal information.

## IMPORTANT INFORMATION

### Use of this Website

If you do not want us to handle your personal information as described in this Privacy Policy, please do not use this website as it may be modified, relocated, and/or redirected from time to time (the “Site”).

### Applicability

This Privacy Policy applies to the personal information of users of the Site and the Company’s services (“Consumers”). It does not apply to the Company’s employees, job applicants, contract workers, or others whose personal information the Company collects for purposes related to human resources. “Consumer” also does not include employees or other agents of a business engaged in a transaction with Company in their capacities as employees or agents of that business. This Privacy Policy refers to all categories of Consumers collectively, except where the Privacy Policy applies only to a specific category of Consumer, e.g., current and prospective residents, in which case the relevant category is specified.

### Personal Information

“Personal information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household.

### Assistance for the Disabled

Alternative formats of this Privacy Policy are available to individuals with a disability. Please contact [ccparequest@tenatclarendon.com](mailto:ccparequest@tenatclarendon.com) for assistance.

### Children’s Online Privacy Protection Act Compliance

We do not collect any information from anyone under 13 years of age. The Site and the Company’s services are all directed to people who are at least 13 years old or older. If you are under the age of 13, you are not authorized to use the Site.

## CONTENTS

- Section 1 // What personal information we collect
- Section 2 // The sources from which we collect your personal information
- Section 3 // The purposes for which we use your personal information
- Section 4 // How we share your personal information
- Section 5 // California-specific information
- Section 6 // Changes to this Privacy Policy

### SECTION 1 // WHAT PERSONAL INFORMATION WE COLLECT

- a. Identifiers, including: real name, alias, telephone number, Internet Protocol address, and email address. In addition, if you are a current resident, we may also collect your postal address, date of birth, Social Security number, and driver's license number or state identification card number for identity verification purposes.
- b. **Characteristics of Protected Classifications Under California or Federal Law**, including: **applicants to affordable housing can voluntarily self-identify** ethnicity. The Company uses this ethnicity information only, as required by law, to report to state and federal agencies regulating affordable housing.
- c. **Inferences**, including: for current residents', your self-reported interests, e.g., tennis, that you voluntarily provide to us for the purpose of arranging activities and finding other residents with similar interests.
- d. **Financial Information**, including: your payment card number and associated payment information and bank account name and number, to facilitate payments to the Company.
- e. **Internet Activity Information**, including: device identifier, browser information, operating system characteristics, Internet service provider, IP address, and information regarding your interactions with an internet website, application, or advertisement and other online behaviors.
- f. **Geolocation Data**, including: rough geographic location from your IP address.
- g. **Sensory or Surveillance Data**, including: if you are a current resident, footage from video recordings as part of a service request.
- h. **Professional or Employment-Related Information**, including: the name and contact information for your employer and your current salary.
- i. **Commercial Information**, including: if you are a current resident, your vehicle information, and interest in products and services which you identify in connection with joining a resident interest group.

### SECTION 2 // THE SOURCES FROM WHICH WE COLLECT YOUR PERSONAL INFORMATION

The Company collects all the categories of personal information listed above from the individual him/herself, as voluntarily provided by that individual, via the Site, in person, or through forms and surveys embedded in the Site.

The Company also collects Internet Activity Information and Geolocation Data through automated technologies on the Site, e.g., cookies.

#### **Do We Use Cookies?**

Yes. Cookies are small files that the Site transfers to your computer's hard drive through your web browser that enables the Site's systems to recognize your browser and capture and remember certain information. We use cookies to help us understand how users use the Site. For example, cookies gather information about how long you spend on a web page so that we can understand what web pages are of most interest to users.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies by adjusting your browser settings. If you turn off your cookies, some of the features on the Site may not function properly.

### **SECTION 3 // THE PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION**

#### **Business and Commercial Purposes**

- Performing property management and/or asset management services. Property management services include providing property rental, upkeep, maintenance, repair, and related services, determining rental eligibility, verifying resident information and identity, processing payments, and providing analytic services.
- Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with Consumers, including service requests for current residents.
- For community outreach and to build community.
- With respect to prospective residents, for marketing and lead tracking.
- Auditing related to a current interaction with the user and concurrent transactions, including, but not limited to, auditing compliance with the law.
- Detecting security incidents.
- Preventing, discovering, and investigating malicious, deceptive, fraudulent, or illegal activity or violations of this Privacy Policy or any applicable terms of service or terms of use for the Company's services.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use.
- Undertaking activities to verify or maintain the quality or safety of our rental property services, and to improve, upgrade, and enhance our rental property services.

#### **Other Purposes**

- Compliance with the law.
- To protect the rights, property, or safety of the Company, Consumers, or others.

## SECTION 4 // HOW WE SHARE YOUR PERSONAL INFORMATION

### No Sales

The Company does not sell personal information of any individuals.

### Other Disclosures

For all categories of Personal Information:

- The Company and certain of its related companies may work in concert to manage real estate properties and provide services to residents (the “Property Management Team”). The Company may share personal information with its Property Management Team for the business and commercial purposes listed above.
- The Company may disclose personal information about service members to the U.S. military, upon the military’s request and as permitted by law.
- The Company discloses personal information to vendors, as necessary for the business and commercial purposes listed above, including, but not limited to, unrelated property management companies, payment processing vendors, lead tracking vendors, and collections vendors, law firms, auditors, and consultants.
- The Company discloses personal information to government agencies, law enforcement, and other parties as required by law and as necessary to protect the rights, property, or safety of the Company, its subsidiaries or related companies, employees, customers, and users.
- The Company may share personal information with a third party in connection with or during negotiations of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

## SECTION 5 // CALIFORNIA-SPECIFIC INFORMATION

### Your California Privacy Rights and How to Exercise Them

This California section applies only to the personal information of Consumers who are residents of California (“California Consumers”).

#### a. Your California Privacy Rights

- Right to Know. California Consumers have the right to submit a verifiable request to know what personal information the Company collects, uses, discloses, and sells about them.
- Right To Delete. California Consumers have the right to submit a verifiable request for deletion of their personal information that the Company has collected or maintains.
- Right to Opt Out of Sale. California Consumers have the right to opt out of the sale of their personal information. California Consumers under the age of 16 must opt in to the sale of their personal information, or their parent or guardian must opt in on their behalf. As noted above, the Company does not sell personal information. In addition, the Company does not have actual knowledge that it sells the personal information of anyone under 16 years of age.

#### b. How to Exercise Your Rights

The Company will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights to know and to delete in the following ways:

- Complete the online request form available [here](#).

### **c. How We Will Verify Your Request**

The processes that we follow to verify your identity when you make a request to know or a request to delete are described below. The relevant process depends on how and why the request is submitted.

If you submit a request by any means other than through a password-protected account that you created before the date of your request, the verification process that we follow will depend on the nature of your request as described below:

1. **Requests To Know Categories Or Purposes.** If you request to know categories of personal information collected, sources, sales, or the Company's business or commercial purposes for use of your personal information, we will match at least two data points that you provide with your request to know, or in response to our request for verification information, against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity. Examples of relevant data points include your mobile phone number, your zip code, or information about products or services that you have purchased from us.
2. **Requests To Know Specific Pieces Of Personal Information.** We will match at least three data points that you provide with your request to know, or in response to our request for verification information, against information that we already have about you in our records and that we have determined to be reliable for purposes of verifying your identity. In addition, we will require you to sign a declaration under penalty of perjury that you are the California Consumer whose personal information is the subject of the request.
3. **Requests To Delete Personal Information.** Our process for verifying your identity will depend on the sensitivity (as determined by the Company) of the personal information that you ask us to delete. For less sensitive personal information, we will require a match of two data points as described in Point No. 1, above. For more sensitive personal information, we will require a match of three data points and a signed declaration as described in Point No. 2, above.

We have implemented the following additional procedures when verifying the identity of requestors:

1. If we cannot verify your identity based on the processes described above, we may ask you for additional verification information. If we do so, we will not use that information for any purpose other than verification.
2. If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

### **d. Authorized Agents**

If an authorized agent submits a request to know or a request to delete on your behalf, the authorized agent must submit with the request either (a) a power of attorney that is valid under California law, or (b) a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity. You can obtain an "Authorized Agent Designation" form by contacting us at [ccparequest@tenatclarendon.com](mailto:ccparequest@tenatclarendon.com).

### **e. The Company's Non-Discrimination Policy**

California Consumers have the right not to be subject to discriminatory treatment by the Company for exercising their privacy rights under the California Consumer Privacy Act, and the Company will not discriminate on that basis.

#### **f. Tracking Users Over Time And Across Sites**

We track your online activities over time and across websites or online services on an individually identifiable basis. For example, we may serve you advertisements on other websites based on what appeared to interest you on our Site. We do not allow third parties to use our Site to track your activities over time or across other websites.

Some web browsers incorporate a “Do Not Track” feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. Many websites and applications, including our Site, do not currently respond to web browser DNT signals because such signals are not yet uniform. For more information about DNT signals, please visit <http://allaboutdnt.com/>.

## **SECTION 6 // CHANGES TO THIS PRIVACY POLICY**

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

### **For More Information**

For questions or concerns about the Company's privacy policies and practices, please contact us at [ccparequest@tenatclarendon.com](mailto:ccparequest@tenatclarendon.com).