



PRIVACY POLICY STATEMENT

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ManageAmerica Integrated Billing Services LLC (together with its affiliates, parents and subsidiaries, "**ManageAmerica**," "**our**," "**we**" or "**us**") is a third-party vendor that provides services directly to the owners, operators and managers (collectively, "**Property Owner**") of manufactured home communities, recreational vehicle parks, apartment structures, commercial facilities, retail facilities, storage facilities residential communities and other real estate assets.

This is the ManageAmerica Online Privacy Policy Statement ("**Privacy Policy**") for all websites, servers and online platforms owned and/or operated by ManageAmerica and/or its affiliates in the conduct of ManageAmerica's business including, without limitation, the site www.manageamerica.com (including, without limitation, all sub domains, extensions and affiliated sites thereof), ManageAmerica's online Property Owner platform, ManageAmerica's online Resident Portal platform, and the various modules and online access points on such site (collectively, the "**Sites**", to the extent they are not governed by their own privacy policy), as well as the use of any mobile device application created by ManageAmerica (each, the "**Mobile App**") and our web-based payment and other applications and APIs (collectively, the "**Web App**") available to Property Owners and other Internet users visiting our website ("**You**" or "**Your**"). The Sites, Mobile App, and Web App collectively referred to as "**Services**". If you are a resident of a property, your property manager may have its own privacy notice describing its privacy practices. While this Privacy Policy may describe how we process personal or business information about You on our own behalf, it also generally describes how we process it on behalf of our property owner customers on their behalf. However, if there is a conflict between the contents of this Privacy Policy and the privacy policy provided by a property manager to their residents, such privacy notice will take precedence.

If You do not agree with this Privacy Policy, please discontinue Your access or use of our Services immediately. **THROUGH YOUR USE OF ANY OF OUR SERVICES, YOU CONSENT TO THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY.**

PLEASE READ THIS PRIVACY POLICY CAREFULLY. We respect Your privacy and are committed to protecting any personal or business information You share with us, directly (by accessing the Services) or indirectly (by providing such information to third parties such as one or more Property Owners), in connection with using the Services. This Privacy Policy explains how we collect personal or business information about You in connection with using our Services and how this information is then used or disclosed.

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1. INFORMATION WE MAY COLLECT

We do not generally collect such personal or business information about You through the use of our Services unless You choose to provide it to us voluntarily, either directly (by accessing the Services) or indirectly (by providing such information to third parties such as one or more Property Owners), in connection with using the Services. In addition, we may also collect certain personal or business information about You automatically as you use the Services through cookies and other similar technology. If You do provide us with personal or business information, we will only use it for the purposes described in this Privacy Policy. If You encounter a screen or page that requests information You do not want to share with us, do not enter the information. We define “personal or business information” as information that is unique to You and Your business.

Personal or Business Information You Provide

We may collect personal or business information that You provide when using our Services. Such personal or business information may be collected when: You fill out and submit forms (online or otherwise), when You initiate payments to us or to third parties through the use of our Services, when You post to any interactive forum, bulletin board, chat room that we may make available on our Services, when You register for e-mail communications, when You submit a survey response, question or request using a form or the e-mail address links via the Services , through interactions with You through the telephone, email communications or otherwise, or indirectly, when you provide such information to third parties (such as one or more Property Owners), in connection with using the Services.

The personal or business information You provide and which we may collect includes:

- Your name, email address, physical address, phone number, and other historical, contact, and demographic information.
- Information such as bank account, payment card numbers, credit reports, and tax information.
- When You use our Services to make, request, or record payments, we collect information about when and where the transaction occurs, a description of the transaction, the payment amount, billing information, and the payment method used to complete the transaction.
- Information that You voluntarily provide to us, including Your responses to any of our inquiries, suggestions for improvements, referral, information about products and services You sell (including inventory, pricing and other data) and other information You provide about You or Your business.

Personal or Business Information we may collect from Third Parties

The personal or business information we may collect from third parties about You includes:

- Personal or business information from third party verification services, credit bureaus, financial institutions, mailing list providers, and publicly available sources. In some circumstances, where lawful, this information may include Your government-issued identification number
- To the extent permitted by law, we may obtain background check reports from public records of criminal convictions and arrest records.
- Personal or business information about You from third parties in connection with any credit investigation, credit eligibility, identity or account verification process, fraud detection process, or collection procedure, or as may otherwise be required by law. This includes, without limitation, the receipt and exchange of account or credit-related information with any credit reporting agency or credit bureau.

Personal or Business Information We Collect Automatically When Using Our Services

We may collect personal or business information about You and the devices You use to access our Services, such as Your computer, mobile phone, or tablet (collectively, “**Computer**”). Such personal or business information that we may collect includes cookies, activity information related to your use of the Services (including via session replay software, such as information about the links clicked, searches, features used, modules or sections viewed and your interactions with us within the Services and similar activity and usage information), Internet Protocol addresses (IP addresses), web beacons, web browser type (e.g. Internet Explorer, Firefox, Chrome), host or service provider (e.g. AT&T, Charter, Comcast, Cox, Time Warner, Verizon), operating system (e.g. Windows 10, Mac OS X) and date and time stamps.

A cookie is a small file placed on the hard drive of Your Computer. Some cookies may last only through a single website session or visit. Others’ cookies may have an expiration date or may remain on Your Computer until You delete them. You may disable our use of non-essential cookies through our cookie consent manager, which you may access by clicking the “Cookie Settings” link at the bottom of our Services and disabling our use of marketing, functional, analytics, and other non-essential cookies. You may also set your browser to refuse all or some cookies, or to alert you when cookies are being sent, by configuring Your preferences or options in Your browser. However, if You choose to reject cookies through browser settings, You may not be able to use or access our Services.

An IP address is a number that is automatically assigned to Your Computer whenever You access the Internet, which our web servers use to identify where to send the information Your Computer requests. When You request pages from our Services, our servers log Your IP address as well as information about Your activities while using our Services.

A web beacon is a small graphic image or other web programming code that may be included in our Services and messages. A web beacon may be invisible, but any electronic image or other web programming code can act as a web beacon. A web beacon may be used for a number of reasons, including counting visitors using our Services, to monitor how users navigate through our Services, to count how many e-mails were opened or to count how many links were actually viewed.

We may occasionally use other companies to set cookies when using our Services and gather cookie information for us. We use the cookie information gathered by these companies in the same manner as stated above. In some cases, we retain both the cookie information and/or the information You provide to us online. For example, we may use the cookie information to complete a transaction You requested

or to keep historical records of Your past transactions. In other cases, we only retain the cookie and/or online information You give us if You request us to do so for Your use in subsequent sessions.

To learn more about cookies and similar tracking technologies, and how they can affect Your privacy, visit allaboutcookies.org.

BY CONTINUING TO ALLOW US TO USE COOKIES AND SIMILAR TECHNOLOGIES DESCRIBED ABOVE, YOU HEREBY CONSENT TO OUR RECORDING YOUR MOUSE MOVEMENTS, KEYSTROKES, NAVIGATION PATHWAYS, USE AND COMMUNICATIONS YOU MAY HAVE WITH OUR SERVICES (INCLUDING INFORMATION RELATED TO YOUR ACCESS TO ANY AUDIO-VISUAL MATERIALS AVAILABLE ON OR THROUGH THE WEBSITE THAT), AND OTHER ACTIONS THAT YOU TAKE ON OR THROUGH THE WEBSITE AND OUR DISCLOSURE OF SUCH RECORDED INFORMATION TO THIRD-PARTY PROVIDERS OF SUCH TOOLS.

2. USE OF INFORMATION WE COLLECT

We retain and use Your personal or business information to: (i) provide You with our services or process transactions that You have requested; (ii) communicate with You regarding information, features or offers that we believe will be of interest to You; (iii) respond to Your questions or other requests; (iv) contact You regarding our services or processing a transaction; (v) process or communicate with You about applications, payments or changes to Your account information; (vi) process other information or personal or business information that You submit using our Services; (vii) conduct surveys; (viii) contact You for any questions You may have; (ix) improve our Services and fix bugs; (x) secure our Services; and/or (xi) fulfill other purposes disclosed at the time You provide Your personal or business information. We may also use the information to improve ManageAmerica's services, to customize certain reports when using our Services (e.g. Custom Report Writer), to serve You specific content, or for any other purposes not inconsistent with this Privacy Policy or prohibited by law.

We also may use the information we obtain about You in other ways with Your consent.

We may use and disclose information that is not in personally identifiable form for any lawful purpose. If we combine information that is not in personally identifiable form with information that is, we will treat the combined information as personal information for so long as it is combined.

3. INFORMATION SHARING

We will not sell, license, transmit or disclose Your personal or business information unless: (i) You expressly authorize us (or any of our affiliates) to do so; (ii) in order to respond to, process and fulfill Your requests; (iii) in order to allow our trusted service providers or agents to provide services for us; (iv) in order to provide our services to You; (v) in connection with a sale all or substantially all of the assets of ManageAmerica (or any ManageAmerica affiliate with substantial connection to the personal or business information) or the merger of ManageAmerica into another entity or any consolidation, share exchange, combination, reorganization or like transaction in which ManageAmerica participates; (vi) in order to enforce our Terms of Use ([INSERT LINK](#)) and prevent or investigate suspected fraud or illegal or unauthorized transactions or activities which may violate our Terms of Use [INSERT LINK](#); (vii) in order to respond to inquiries or requests from government, regulatory, law enforcement or public authorities; (viii) in order to permit us to protect our legal rights, privacy or safety, and those of our affiliates, employees, agents and contractors, Property Owners and their employees, or others, and to pursue available

remedies, commence, participate in, or defend litigation or limit the damages that we may sustain; (ix) in order to comply with subpoenas, search warrants, the law or other legal process; or (x) otherwise as we are required or permitted by law.

As appropriate, we may provide Your personal or business information to authorized third parties consistent with this Privacy Policy. We are not responsible for the websites or privacy practices of such parties, nor are we responsible for any security breach or unauthorized access that may occur to Your personal or business information in the possession of any of such parties.

4. YOUR CHOICES

We offer You certain choices about what information we collect from You while using our Services, how we use and disclose this information, and how we communicate with You.

Cookies

Most browsers will tell You how to stop accepting new cookies, how to be notified when You receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies You may not be able to take full advantage of all our Services. In addition, disabling cookies may cancel opt-outs that rely on cookies, such as web analytics.

Online Behavioral Advertising

The advertising networks in which we participate may be members of self-regulatory organizations or programs that manage the privacy choices these advertising networks offer consumers. For example, some of our ad networks may manage their privacy choices through the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1>). Please note that we also may work with ad networks that offer their own opt-out mechanisms and may not participate in organizations such as the Network Advertising Initiative.

5. JURISDICTION SPECIFIC PRIVACY RIGHTS

The law in some jurisdictions may provide you with additional rights regarding our use of personal or business information. To learn more about any additional rights that may be applicable to you as a resident of one of these jurisdictions, please see the privacy addendum for your jurisdiction that is attached to this Privacy Policy.

6. CHILDREN

Our Services are not directed to children under the age of 18, and we do not knowingly collect or use personally identifiable information from, anyone under 18 years of age. Children under 18 are expressly prohibited from submitting any personal information to us, and if we discover that we have inadvertently gathered any such information from a child under 18, we will take appropriate steps to delete it.

7. PROTECTION OF PERSONAL INFORMATION

We restrict access to personal or business information collected about You through our Services to our employees and our authorized vendors, our affiliates, our affiliates' employees authorized vendors, or

others who need to know this information to provide our services to You or in the course of administering and conducting our business. We use commercially reasonable efforts to maintain appropriate physical, electronic and procedural safeguards to protect personal and other information. We use commercially reasonable efforts to protect our database with various physical, technical and procedural measures and we restrict access to Your information by unauthorized persons.

While we maintain security measures in place in order to attempt to protect against the loss, misuse and alteration of Your personal or business information under our control, the Internet and other various networking communication media are not entirely secure, and Your information may therefore be subject to interception or loss which is beyond our control. While we strive to protect Your personal or business information, we cannot ensure or warrant the security of any of Your personal or business information You transmit to us. Any transmission is done at Your own risk. WE ASSUME NO RESPONSIBILITY OR LIABILITY FOR DISCLOSURE OF YOUR PERSONAL OR BUSINESS INFORMATION DUE TO ERRORS IN TRANSMISSION, UNAUTHORIZED THIRD-PARTY ACCESS OR OTHER CAUSES BEYOND OUR REASONABLE CONTROL.

You may request a copy of the information that we currently hold about You by sending a detailed email to our email address with all specifics necessary for us to consider and respond to Your request.

8. DATA RETENTION PERIODS

We will retain your personal or business information for the entire time that you keep your account open. After you close your account, we may retain your personal or business information :

- for as long as necessary to comply with any legal requirement;
- on our backup and disaster recovery systems in accordance with our backup and disaster recovery policies and procedures;
- for as long as necessary to protect our legal interests or otherwise pursue our legal rights and remedies; and
- for data that has been aggregated or otherwise rendered anonymous in such a manner that you are no longer identifiable, indefinitely.

9. INTERNATIONAL USERS

Our Services originate in the United States and are governed by United States laws, including those governing the privacy and security of Your information. If You use our Services, You are transferring Your personal or business information to ManageAmerica and its service providers in the United States. By using our Services, You consent to the transfer of Your personal or business information to the United States, and our handling of Your personal or business information in accordance with applicable United States requirements and this Privacy Policy.

Your personal or business information may be transferred to, stored, and processed in any country where we or the parties with whom we share Your personal or business information have facilities, which may include countries other than Your country of residence. These other countries may have different data protection laws than Your country of residence. In these circumstances, the governments, courts, law enforcement, or other regulatory agencies of those countries may be able to access your personal or business information through the laws of those countries. By using our Services, YOU CONSENT TO THE

TRANSFER, STORAGE, AND PROCESSING OF YOUR PERSONAL OR BUSINESS INFORMATION AS DESCRIBED ABOVE.

10. LINKS TO OTHER WEBSITES

This Site may contain other links to third party websites. While we endeavor to work with third parties that share our respect for user privacy, we are not responsible for the websites or privacy practices of such third parties. We do not endorse these parties, their content or any products and services they offer. We are not responsible for the privacy practices or content of such websites. You are responsible for knowing when You are leaving our website to visit a third party website, and for reading and understanding the terms of use and privacy policy statements for each such third party website.

11. PRIVACY POLICY UPDATES

We may update this Privacy Policy from time to time and without prior notice to You. Changes may apply to any personal or business information we already hold about You and any new personal or business information collected after the Privacy Policy is updated. If we make changes, we will notify You by revising the “Last Modified” date at the top of this Privacy Policy. You are responsible for periodically reading this Privacy Policy. By continuing to access or use our Services after those changes become effective, You agree to be bound by the updated Privacy Policy. This Privacy Policy is not intended to and does not create any contractual or other legal right in or on behalf of any person with or against ManageAmerica.

12. TERMS OF USE

Please read our Terms of Use ([INSERT LINK](#)) to understand the terms that apply to Your use of our Services. By using our Services, You acknowledge that You have read our Terms of Use ([INSERT LINK](#)) and this Privacy Policy, and agree to comply with them.

13. CONTACT US

If You have any questions or concerns about this Privacy Policy, please email us at privacy@manageamerica.com. You can also reach us by regular mail at: ManageAmerica Integrated Billing Services LLC, 4804 Laurel Canyon Blvd. #536, Valley Village, CA 91607-3717, Attn: Privacy Rights.

MANAGE AMERICA
Privacy Policy Addendum for California Residents

1. INTRODUCTION

This Privacy Policy Addendum for California Residents (the “**California Privacy Addendum**”) supplements the information contained in Manage America Privacy Policy Statement and describes our collection and use of Personal Information (as defined below). This California Privacy Addendum applies solely to all visitors, users, and others who reside in the State of California (“**Consumers**” or “**You**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively, the “**CPRA**”) and any terms defined in the CPRA have the same meaning when used in this notice.

2. SCOPE OF THIS CALIFORNIA PRIVACY ADDENDUM

This California Privacy Addendum applies to information that we collect when you use any of our Services that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“**Personal Information**”). However, publicly available information that we collect from government records and deidentified or aggregated information (when deidentified or aggregated as described in the CPRA) are not considered Personal Information and this California Privacy Addendum does not apply to such information.

This California Privacy Addendum does not apply to employment-related Personal Information collected from our California-based employees, job applicants, contractors, or similar individuals (“**Personnel**”). Please contact your local human resources department if you are part of our California Personnel and would like additional information about how we process your Personal Information.

This California Privacy Addendum also does not apply to certain Personal Information that is excluded from the scope of the CPRA, like: (a) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and (b) Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

3. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

Our Services collect, and over the prior twelve (12) months have collected, the following categories of Personal Information about Consumers (either on our own behalf or on behalf of a property manager):

Personal Information Category	Applicable Pieces of Personal Information Collected
Identifiers.	A real name; alias; postal address; unique personal identifier; online identifier; Internet Protocol address; email address; account name;; and other similar identifiers.
Personal information categories listed in the California Customer Records statute (Cal.	A name; address; telephone number; employment. <i>Some Personal Information included in this category may overlap with other categories.</i>

Civ. Code § 1798.80(e)).	
Commercial information.	Records of residential locations and facilities, obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet or other similar network activity.	Information on a Consumer's interaction with a website or application.
Geolocation data.	Physical location or movements. We collect IP-based information about your physical location or movements. This IP-based information can only identify your physical location or movements to a geographic region, such as town, city, state, and country, but cannot be used to identify your precise physical location or movements.
Professional or employment-related information.	Current or past job history.
Sensitive Personal Information ("Sensitive Personal Information")	• Complete account access credentials (user names combined with required access/security code or password) •

ManageAmerica will not collect additional categories of Personal Information without providing you notice. As further described in [To Whom Do We Sell or Share Your Personal Information](#), through our use of cookies and other similar tracking technologies, we may "sell" any categories of Personal Information for monetary or other valuable consideration and we may "share" any categories of Personal Information for cross-context behavioral advertising.

4. PURPOSES FOR OUR COLLECTION OF YOUR PERSONAL INFORMATION

We only use your Personal Information for the purposes described in our Privacy Policy.

In addition, We may use or disclose the Personal Information we collect and, over the prior twelve (12) months, have used or disclosed the Personal Information we have collected, for the purposes described in our Privacy Notice as well as the following additional purposes:

- Short-term, transient use, provided the Personal Information that is not disclosed to another third-party and is not used to build a profile about you or otherwise alter your experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Performing services on behalf of us or our property manager customers, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.

We may use, "sell" for monetary *or other valuable consideration*, "share" for the purposes of cross-context behavioral advertising, or disclose the Personal Information we collect through the use of cookies and other similar technologies on our Services.

ManageAmerica will not use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

5. THIRD PARTIES TO WHOM WE DISCLOSE YOUR PERSONAL INFORMATION TO FOR BUSINESS PURPOSES

ManageAmerica may disclose your Personal Information to third parties for one or more business purposes.

In the preceding twelve (12) months, ManageAmerica has disclosed the following categories of Personal Information for one or more of the business purposes described below to the following categories of third parties:

Personal Information Category	Categories of Third Party Recipients
Identifiers.	Property managers and owners; Service Providers affiliates, parents, and subsidiary organizations of ManageAmerica; Internet cookie information recipients, such as analytics services, and government entities.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Property managers and owners; Service Providers; advertisers and advertising networks; affiliates, parents, and subsidiary organizations of ManageAmerica; Internet cookie information recipients, such as analytics services, and government entities.
Protected classification characteristics under California or federal law.	Property managers and owners; Service Providers; and affiliates, parents, and subsidiary organizations of ManageAmerica.
Commercial information.	Property managers and owners; Service Providers; advertisers and advertising networks; affiliates, parents, and subsidiary organizations of ManageAmerica; Internet cookie information recipients, such as analytics services, and government entities.
Internet or other similar network activity.	Property managers and owners; Service Providers; advertisers and advertising networks; affiliates, parents, and subsidiary organizations of ManageAmerica; Internet cookie information recipients, such as analytics services, and government entities.
Geolocation data.	Service Providers; affiliates, parents, and subsidiary organizations of ManageAmerica; and Internet cookie information recipients, such as analytics and behavioral analytics services.
Sensory data.	Property managers and owners; Service Providers; affiliates, parents, and subsidiary organizations of ManageAmerica.
Professional or employment-related information.	Property managers and owners; Service Providers; affiliates, parents, and subsidiary organizations of ManageAmerica.
Inferences drawn from other Personal Information.	Property managers and owners; Service Providers; advertisers and advertising networks; affiliates, parents, and subsidiary organizations of ManageAmerica; and Internet cookie information recipients, such as analytics services.

Sensitive Personal Information Category	Categories of Third Party Recipients
Government identifiers (social security, driver's license, state identification card, or passport number)	Property managers and owners; Service Providers; affiliates, parents, and subsidiary organizations of ManageAmerica; government entities; and credit reporting agencies.
Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)	Property managers and owners; Service Providers; and affiliates, parents, and subsidiary organizations of ManageAmerica.
Precise geolocation	Property managers and owners; Service Providers; and affiliates, parents, and subsidiary organizations of ManageAmerica.
Racial or ethnic origin	Property managers and owners; Service Providers; and affiliates, parents, and subsidiary organizations of ManageAmerica.
Religious or philosophical beliefs	Property managers and owners; Service Providers; and affiliates, parents, and subsidiary organizations of ManageAmerica.
Health, sex life, or sexual orientation information	Property managers and owners; Service Providers; and affiliates, parents, and subsidiary organizations of ManageAmerica.

We disclose your Personal Information to the categories of third parties listed above for the following business or commercial purposes:

- Helping to ensure security and integrity [of our products, services, and IT infrastructure] to the extent the use of the Personal Information is reasonably necessary and proportionate for these purposes.
- Debugging to identify and repair errors that impair existing intended functionality.
- [Performing services on behalf of us or our property manager customers, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of us or our property manager customers.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

In addition to the above, we may disclose any or all categories of Personal Information to any third-party (including government entities and/or law enforcement entities) as necessary to:

- comply with federal, state, or local laws, or to comply with a court order or subpoena to provide information;

- comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- cooperate with law enforcement agencies concerning conduct or activities that we (or one of our service providers') believe may violate federal, state, or local law;
- comply with certain government agency requests for emergency access to your Personal Information if you are at risk or danger of death or serious physical injury; or
- exercise or defend legal claims.

6. TO WHOM WE SELL OR SHARE YOUR PERSONAL INFORMATION

As noted in our Privacy Notice, we do not sell Personal Information as the term “sell” is commonly understood to require an exchange for money. However, the use of advertising and analytics cookies on our Website is considered a “sale” of Personal Information as the term “sale” is broadly defined in the CPRA to include both monetary *and other valuable consideration*. Using this broad definition, our “sale” is limited to our use of third-party advertising and analytics cookies and their use in providing behavioral advertising and their use in understanding how people use and interact with our Website(s). Our “sales” of your Personal Information in this matter is subject to your right to opt-out of those sales (see [Your Choices Regarding our “Sale” or “Sharing” of your Personal Information](#)).

“Sharing” of Your Personal Information for Cross-Context Behavioral Advertising

ManageAmerica may “share” your Personal Information for the purpose of cross-context behavioral advertising, subject to your right to opt-out of that sharing (see [Your Choices Regarding our “Sale” or “Sharing” of your Personal Information](#)). Our “sharing” for the purpose of cross-context behavioral advertising would be limited to our use of third-party advertising cookies and their use in providing you cross-context behavioral advertising (i.e., advertising on other websites or in other mediums). When the recipients of your Personal Information disclosed for the purpose of cross-context behavioral advertising are also permitted to use your Personal Information to provide advertising to others, we also consider this disclosure as a “sale” for monetary or other valuable consideration under the CPRA.

In the preceding twelve (12) months, we have “sold” for monetary or other valuable consideration, or “shared” for the purpose of cross-context behavioral advertising, the following categories of Personal Information to the following categories of third parties:

Personal Information Category	[Sold or Shared]	Business or Commercial Purpose for Sale or Sharing (as appropriate)	Categories of Third Parties To Whom Your Personal Information is Sold or Shared
Identifiers.	Sold and Shared	Services analytics and advertising of our products and services.	Advertisers and advertising networks; social media companies; and Internet cookie information recipients, such as analytics services.
Personal information categories listed	No	N/A	N/A

in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).			
Protected classification characteristics under California or federal law.	No	N/A	N/A
Commercial information.	Sold and Shared	Services analytics and advertising of our products and services.	Advertisers and advertising networks; social media companies; and Internet cookie information recipients, such as analytics services.
Internet or other similar network activity.	Sold and Shared	Services analytics and advertising of our products and services.	Advertisers and advertising networks; social media companies; and Internet cookie information recipients, such as analytics services.
Geolocation data.	Sold and Shared	Services analytics and advertising of our products and services.	Advertisers and advertising networks; social media companies; and Internet cookie information recipients, such as analytics services.
Sensory data.	No	N/A	N/A
Professional or employment-related information.	No	N/A	N/A
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	No	N/A	N/A
Inferences drawn from other	Sold and Shared	Services analytics and advertising of our products and services.	Advertisers and advertising networks; social media companies; and Internet

Personal Information.			cookie information recipients, such as analytics services.
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Sensitive Personal Information Category	[Sold or Shared]	Business Purpose for Sale or Sharing (as appropriate)	Categories of Third Parties To Whom Your Personal Information is Sold or Shared
Government identifiers (social security, driver's license, state identification card, or passport number)	No	N/A	N/A
Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)	No	N/A	N/A
Precise geolocation	No	N/A	N/A
Racial or ethnic origin	No	N/A	N/A
Health, sex life, or sexual orientation information	No	N/A	N/A

Sale or Sharing of Personal Information of Minors Under the Age of 16

We do not have any actual knowledge that we “sell” the Personal Information of minors under the age of 16 for monetary or other valuable consideration and we do not have any actual knowledge that we “share” such Personal Information for cross-context behavioral advertising without affirmative consent as required by the CPRA since children under 16 are not permitted to directly use the Services.

7. CONSUMER DATA REQUESTS

The CPRA provides California residents with specific rights regarding their Personal Information that we collect for our own purposes. This section describes your CPRA rights that we provide and explains how to exercise those rights. You may exercise these rights yourself or through your Authorized Agent. For

more information on how you or your Authorized Agent can exercise your rights, please see [Exercising Your CPRA Privacy Rights](#).

Note that we are unable to provide you with any of these rights regarding any of your Personal Information that we process for or on behalf of a property owner or manager or any other third party and can only provide these rights to the extent we process Personal Information for our own benefit. If you are a resident, your property manager or owner may not provide all or any of these rights. Please check with your property manager or owner for more information regarding what rights they may provide and how to exercise these rights, if any. We will direct you to contact your property manager or owner to the extent we process any Personal Information that is the subject of your request for or on behalf of the property manager or owner.

- **Right to Know.** You have the right to request that we disclose certain information to you about our collection and use of your Personal Information for our own behalf over the past 12 months (a “**Right to Know**” Consumer Request). This includes: (a) the categories of Personal Information we have collected for our own behalf about you; (b) the categories of sources from which that Personal Information came from; (c) our purposes for collecting this Personal Information for our own behalf; (d) the categories of third parties with whom we have shared your Personal Information that we have collected for our own behalf; and (e) if we have “sold” or “shared” or disclosed your Personal Information that we have collected for our own behalf, a list of categories of third parties to whom we “sold” or “shared” such Personal Information, and a separate list of the categories of third parties to whom we disclosed your Personal Information to. You must specifically describe if you are making a Right to Know request or a Data Portability Request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge.
- **Access to Specific Pieces of Information (Data Portability).** You also have the right to request that ManageAmerica provide you with a copy of the specific pieces of Personal Information that we have collected for our own behalf about you, including any such Personal Information that we have created or otherwise received from a third-party about you (a “**Data Portability**” Consumer Request). If you make a Data Portability Consumer Request electronically, we will provide you with a copy of your Personal Information in a portable and, to the extent technically feasible, readily reusable format that allows you to transmit the Personal Information to another third-party. You must specifically describe if you are making a Right to Know request or a Data Portability request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. In response to a Data Portability Consumer Request, we will not disclose your social security number, driver’s license number or other government-issued identification number, financial account number, health insurance or medical identification number, or your account password or security question or answers. We will also not provide this information if the disclosure would create a substantial, articulable, and unreasonable risk to your Personal Information, your account with ManageAmerica, or the security of our systems or networks. We will also not disclose any Personal Information that may be subject to another exception under the CPRA. If we are unable to disclose certain pieces of your Personal Information, we will describe generally the types of personal information that we were unable to disclose and provide you a description of the reason

we are unable to disclose it.] You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge.

- **Correction.** You have the right to request that we correct any incorrect Personal Information about you that we have collected for our own behalf to ensure that it is complete, accurate, and as current as possible. You may review and correct some of this Personal Information about yourself by logging into the Services and visiting your “User Admin” page. You may also request that we correct such Personal Information we have about you as described below under [Exercising Your CPRA Privacy Rights](#). In some cases, we may require you to provide reasonable documentation to show that the Personal Information we have about you is incorrect and what the correct Personal Information may be. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect or if the Personal Information is subject to another exception under the CPRA.
- **Deletion.** You have the right to request that ManageAmerica delete your Personal Information that we collected from you for our own behalf and retained, subject to certain exceptions. Once we receive and confirm your Consumer Request (see [Exercising Your CPRA Privacy Rights](#)), we will delete (and direct our service providers to delete) such Personal Information from our records, unless an exception applies pursuant to the CPRA. Some exceptions to your right to delete include, but are not limited to, if we are required to retain your Personal Information to complete the transaction or provide you the goods and services for which we collected the Personal Information or otherwise perform under our contract with you, to detect security incidents or protect against other malicious activities, and to comply with legal obligations. We may also retain your Personal Information for other internal and lawful uses that are compatible with the context in which we collected it.
- **Non-Discrimination.** We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not do any of the following as a result of you exercising your CPRA rights: (a) deny you goods or services; (b) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (c) provide you a different level or quality of goods or services; or (d) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Exercising Your CPRA Privacy Rights

To exercise the rights described above, please submit a request (a “**Consumer Request**”) to us by either:

- Submitting a SUPPORT DESK Ticket.
- Emailing us at privacy@manageamerica.com.

If you fail to make your Consumer Request in accordance with the ways described above, we may either treat your request as if it had been submitted with our methods described above or provide you with information on how to submit the request or remedy any deficiencies with your request.

Only you, or your Authorized Agent that you authorize to act on your behalf, may make a Consumer Request related to your Personal Information. To designate an Authorized Agent, see [Authorized Agents](#) below.

All Consumer Requests must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an Authorized Agent of such a person. This may include:
 - Verifying your current or prior residency or other information we may have access to for our own behalf through your use of the Services.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information that we process for our own behalf if we cannot verify your identity or authority to make the request and confirm which such Personal Information relates to you or the individual for whom you are making the request as their Authorized Agent.

Making a Consumer Request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Information associated with that specific account.

We will only use Personal Information provided in a Consumer Request to verify the requestor's identity or authority to make the request.

[For instructions on exercising sale opt-out rights, see [Your Choices Regarding our "Sale" or "Sharing" of Your Personal Information](#).]

Authorized Agents

You may authorize your agent to exercise your rights under the CPRA on your behalf by providing them with written authorization or with power of attorney to exercise your rights in accordance with applicable laws (an **"Authorized Agent"**). We may request that your Authorized Agent submit proof of identity and that they have been authorized exercise your rights on your behalf. We may deny a request from your Authorized Agent to exercise your rights on your behalf if they fail to submit adequate proof of identity or adequate proof that they have the authority to exercise your rights.

Response Timing and Format

We will confirm our receipt of your Consumer Request within ten (10) business days of its receipt. We will generally process these requests within forty-five (45) calendar days of its receipt. If we require more time (up to an additional 45 calendar days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

In response to a Right to Know or Data Portability Consumer Request, we will provide you with all relevant information we have collected or maintained about you in the twelve (12) month period preceding our receipt of your request (or, if you request, since January 1, 2022), unless an exception applies. The response we provide will also explain the reasons we cannot comply with a Consumer Request, if applicable. For Data Portability Consumer Request, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your Consumer Request unless it is excessive, repetitive, or manifestly unfounded. We reserve the right to consider more than two (2) total Right to Know or Data Portability Consumer Requests (or combination of the two) in a twelve (12) month period to be repetitive

and/or excessive and require a fee. If we determine that your Consumer Request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

8. Your Choices Regarding our “Sale” or “Sharing” of Your Personal Information

“Sale” of Your Personal Information

If you are 16 years of age or older, you have the right to direct us to not sell your Personal Information that we collect or process for our own behalf for monetary or other valuable consideration at any time (the “right to opt-out”). We do not sell the Personal Information of Consumers we actually know are less than 16 years of age. Consumers who opt-in to these “sales” of Personal Information that we collect process for our own behalf may opt-out of future sales at any time.

“Sharing” of Your Personal Information

If you are 16 years of age or older, you have the right to direct us to not share your Personal Information that we collect or process for our own behalf for the purposes of cross-context behavioral advertising, which is showing advertising on other websites or other media based on your browsing history with our Website (the “right to opt-out”). We do not share such Personal Information of Consumers we actually know are less than 16 years of age for this purpose. Consumers who opt-in to this “sharing” of such Personal Information for these purposes may opt-out of future such sharing at any time.

How You May Opt-Out of Our Sale or Sharing of Your Personal Information

To exercise the right to opt-out of the “sale” of your Personal Information for monetary or other valuable consideration and of “sharing” your Personal Information for the purposes of cross-context behavioral advertising, you (or your Authorized Agent) may click the “Do Not Sell or Share My Personal Information” link on the bottom of any page on the Services and adjust your cookie preferences or by configuring your browser to send us a privacy signal as described in more detail below. You may also opt-out of this “sale” or “sharing” by setting your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you do not consent to our use of cookies or select this setting you may be unable to access certain parts of our Website[s] or other websites. You can find more information about cookies at <http://www.allaboutcookies.org> and <http://youonlinechoices.eu>.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize our “sale” and “sharing” of your Personal Information. However, you may change your mind and opt back into the “sale” and “sharing” of Personal Information at any time by adjusting your cookie preferences, disabling the privacy signal described below, or setting your browser to access all or some browser cookies.

You do not need to create an account with us to exercise your opt-out rights. You may be required to provide us with additional contact information so that we may verify your request to opt-in to the sale of your Personal Information. We will only use Personal Information provided in an opt-out request to review and comply with the request.

If you (or your Authorized Agent) submit a request to opt-in to our “sale” or “sharing” of your Personal Information, we will use a two-step process in order to confirm that you want to opt-in for such “sale” or “sharing” of your Personal Information. This process may include verifying your request through your email address on record, calling you on your phone number on record (which may be through the use of an automated dialer), sending you a text message and requesting that you text us a confirmation (which may be through the use of an automated dialer), or sending you a confirmation through US mail. By making a Consumer Request, you consent to us contacting you in one or more of these ways.

Browser Privacy Control Signals

You may also exercise your right to opt-out of the “sale” of your Personal Information for monetary or other valuable consideration and “sharing” your Personal Information for the purposes of cross-context behavioral advertising by setting the privacy control signal on your browser, if your browser supports it. We currently recognize and support the following privacy signals sent by browsers:

- Global privacy control (for more information on how to configure your browser to send this signal, please see <https://globalprivacycontrol.org/>).

When we receive one of these privacy control signals, we will opt you out of any further “sale” or “sharing” of your Personal Information when you interact with our Services through that browser and on that device.

When we receive a privacy control signal, we may also process it in a frictionless manner, which prohibits us from: (a) charging you a fee or requiring any valuable consideration; (b) changing your experience with our products and services; or (c) displaying a notification, pop-up, text, graphic, animation, sound, video, or other content to indicate your choice to opt-out of the “sale” or “sharing” of your personal information (we may, however, display whether you have opted out of the “sale” or “sharing” of your Personal Information when you access our Services). You may configure the privacy control signal to operate in a frictionless manner by consulting the documentation for your browser or plug-in that provides the privacy control signal.

9. Your Choices Regarding our Use and Disclosure of Your Sensitive Personal Information

As further described below, we do not use or disclose your Sensitive Personal Information for any purpose other than the following:

- to perform the services or provide the goods reasonably expected by an average Consumer who requests such goods or services;
- to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information, provided that our use of your Personal Information is reasonably necessary and proportionate for such purposes;
- to resist malicious, deceptive, fraudulent, or illegal actions directed at [Company] and to prosecute those responsible for those actions, provided that our use of your Personal Information is reasonably necessary and proportionate for this purpose;
- to ensure the safety of natural persons, provided that our use of your Personal Information is reasonably necessary and proportionate for this purpose;
- for short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us, provided that the Personal Information is not disclosed to another third-party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us;
- to perform services on behalf of us or for us to perform services on behalf of a property manager or owner, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of us or by us on behalf of a property manager or owner; and

- to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us.

In addition, we may also use or disclose your Sensitive Personal Information for the following purposes:

- As necessary to comply with federal, state, or local laws or comply with a court order or subpoena to provide information;
- To comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- To cooperate with law enforcement agencies concerning conduct or activity that We may reasonably and in good faith believe may violate federal, state, or local law;
- To cooperate with a government agency request for emergency access to Personal Information (including Sensitive Personal Information) if a natural person is at risk or danger of death or serious physical injury; and
- To exercise or defend legal claims.

Because we only use your Sensitive Personal Information for the purpose above as enumerated or otherwise permitted under the CPRA, we are not required to, and do not, provide you with any right to limit the use and disclosure of your Sensitive Personal Information for only the above uses and disclosures.

10. PERSONAL INFORMATION RETENTION PERIODS

We will retain your Personal Information for the periods described in the Privacy Policy.

11. CALIFORNIA PRIVACY ADDENDUM UPDATES

We may update this California Privacy Addendum from time to time, either by itself or as part of updates to the Privacy Policy, as described in the Privacy Policy.

12. CONTACT US

If You have any questions or concerns about this California Privacy Addendum, you may contact us through any of the contact methods described in our Privacy Policy.