

# Redwood Residential Privacy Policy

Redwood Residential, LLC and Redwood Residential CA, Inc. (collectively “Redwood Residential”) respects the privacy of your personal information. As used in this Privacy Notice, terms such as “we”, “our, or “us” refers to Redwood Residential, its affiliates and its subsidiaries, including but not limited to our rental properties. This Privacy Notice describes the processing of Personal Information (defined below) that is provided, collected, or shared on the sites, social media pages, or other platforms that link to this Privacy Notice (collectively, the “Site”), or that is otherwise provided to, or collected by, us in connection with our property management and other services (our “Services”). It also describes your choices about the collection, sharing, and use of your Personal Information. Certain sections of our Site may also be supported by our trusted service providers, so we encourage you to review the Privacy Notice located in the footer of the specific page you are on.

We may modify this Privacy Notice at any time. All changes will be effective immediately upon posting to the Site. Material changes will be conspicuously posted on the Site or otherwise communicated to you.

## 1. Personal Information We Collect

We may collect a range of Personal Information. “Personal Information” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you.

The types of Personal Information we collect may include:

- **Contact Information** – If you submit an inquiry about our Services, register for an account as a resident or prospective renter, book a tour, apply for a lease, or otherwise provide information on our Site, we may collect your contact information. This may include your name, address, email address, and demographic information.
- **Commercial Information** – This includes information about your selection of Services, in particular the Services you have shown interest in, payment processing information, and other commercial information.
- **Location Data** – While navigating our Site your mobile device or browser may share your location data.
- **Usage Information** – When you use our Site, our servers may automatically record information, including your Internet Protocol address (IP Address), browser type, referring URLs (e.g., the site you visited before coming to our Site), domain names associated with your internet service provider, information on your interaction with the Site, and other such information.

- **Professional or Employment-Related Information** – If you apply for employment with us, we will collect your employment and work history, as well as other Personal Information related to your potential employment. This may include your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.
- **Resident or Prospective Renter Information** – If you apply for a lease, we may collect information from the lease application and agreement, and information generated from a consumer report, which may include your name, current and previous physical addresses, employer information, social security number, driver's license number, credit score, credit history, and any bankruptcy or eviction details.
- **Communication Information** – We may collect the contents of your communications with us, whether via e-mail, social media, chat functionality, text message, or otherwise, and inferences we may make from other Personal Information we collect. Where permitted by applicable law, we may collect and maintain records of communications with our agents, representatives, or employees via message, social media, or a similar functionality.

## 2. How We Collect Your Personal Information

- **We May Collect Your Personal Information Directly from You** – For example, if you choose to contact us, interact with our Site, or lease one of our properties.
- **We May Also Collect Personal Information from Third Parties** – For example, we may work with business partners, subcontractors, advertising networks, service providers (who help facilitate our Services to you), analytics providers, credit reporting agencies/bureaus, payment processors, and search information providers who may provide us with Personal Information about you.
- **Through Online Tracking Technologies** – We may use cookies and similar technologies such as pixels, web beacons, and local storage to collect usage and browser information about how you use the Site and Services. We process the Personal Information collected through such technologies to help operate certain features of the Site, to enhance your experience through personalization, and to help us better understand the features of the Site that you and other users are most interested in.

Most browsers provide you with the ability to block, delete, or disable cookies, and your mobile device may allow you to disable transmission of unique identifiers and location data. If you choose to reject cookies or block device identifiers, some features of the Site may not be available, or some functionality may be limited or unavailable. Please review the help pages of your browser or mobile device for assistance with changing your settings.

We do not respond to Do Not Track (“DNT”) signals sent to us by your browser at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.

- **Online Behavioral Advertising** – We may use, and permit others to use, your Personal Information collected via cookies and tracking technologies to serve advertisements that are customized based on predictions about your interests generated from your visits to our Sites and other third party websites.

To change your preferences with respect to certain online ads or to obtain more information about ad networks and online behavioral advertising, visit [National Advertising Initiative Consumer opt-out page](#) or the [Digital Advertising Alliance Self-Regulatory Program](#). Changing your settings with individual browsers or ad networks will not necessarily carry over to other browsers or ad networks. As a result, depending on the opt-outs you request, you may still see our ads. Opting-out of targeted advertising does not opt you out of all ads, just those targeted to you.

- **We use Google Ads to serve ads across various websites.** Google uses cookies to collect data about your visits to the Site to generate targeted advertisements to you on other websites that you visit. To opt-out of this type of advertising by Google, to customize your ad preferences, or to limit Google’s collection or use of such data, visit [Google’s Safety Center](#) and [Google’s Ad Settings](#) and follow [Google’s personalized ad opt-out instructions](#). Opting out will not affect your use of the Site.
- **Through Analytics** – We use analytics services, including Google Analytics, to assist us with analyzing our website traffic through cookies and similar technologies. To learn more about how Google uses data, visit [Google’s Privacy Policy](#) and Google’s page on [“How Google uses data when you use our partners’ sites or apps.”](#) You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

### 3. How We Use Personal Information

To the extent permitted by applicable law, we may use Personal Information to:

- operate the Site and provide support to our business functions;
- fulfill requests, such as to create a resident account, process a lease application, or to complete a resident’s payment;
- protect against criminal activity, claims and other liabilities;
- send you information about our company, Services, and promotions;
- meet our contractual requirements;
- comply with applicable legal or regulatory requirements and our policies;
- respond to inquiries related to employment opportunities;

- market, advertise, and provide the Site and our Services; and
- the extent necessary for any other lawful purpose for which the Personal Information is collected.

#### 4. Sharing of Personal Information

We may share your Personal Information in the following circumstances:

- **To Service Providers** – When we hire a service provider to help operate the Site or our business functions, we may give access to Personal Information as necessary to perform the Services on our behalf.
- **To Business Partners** – We may share Personal Information with our trusted business partners for their marketing purposes. For example, we may share your Personal Information with a company when we co-sponsor an event or service. These partners and affiliates may use your Personal Information to, among other things, send you information or contact you about their services and products.
- **For Legal or Safety Reasons** – When we have a good faith belief that access, use, preservation or disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of the Terms of Use, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Redwood Residential, its users, or the public against harm.
- **In the Case of a Merger or Sale** – If we are involved in a merger, acquisition, or any form of transfer or sale of some or all of our business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, Personal Information may be transferred along with the business.

#### 5. How Long Do We Keep Your Personal Information

We will retain your Personal Information for as long as necessary to fulfill the purposes for which it has been collected, as outlined in this Privacy Notice, or any longer retention period required by law. If you are a California resident, please see the section below titled Notice to California Residents for additional information about how long we retain your Personal Information.

## **6. How We Protect Your Personal Information**

We use our commercially reasonable efforts to protect the confidentiality and security of Personal Information. However, despite these efforts, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Information, we cannot guarantee that our security measures will prevent third parties such as hackers from illegally obtaining access to Personal Information.

## **7. Your Choices and Controls**

Depending on where you live, you may have the following rights with respect to your Personal Information:

- Access: You may have the right to know what Personal Information we have collected about you and to access such data.
- Data portability: You may have the right to receive a copy of your information in a portable and readily usable format.
- Deletion: You may have the right to delete your Personal Information that we have obtained, subject to certain exceptions.
- Correction: You may have the right to correct inaccuracies in your Personal Information.
- Opt-out of certain processing: You may have the right to opt out of the processing of your information for purposes of (a) targeted advertising, (b), the sale of your Personal Information; or (c) profiling in furtherance of decisions that produce legal or similarly significant effect concerning you

To exercise any of these rights available to you, see Section 12 below.

To opt out of marketing emails, please email us at [privacy@redwoodresidential.com](mailto:privacy@redwoodresidential.com) or by following the instructions included in the email or text correspondence. Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law. Additionally, if you withdraw your consent or object to processing of your Personal Information, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our Services to you.

## **8. International Use of the Site**

This Site is hosted in the United States. If you are visiting this Site from outside of the United States, please note that your Personal Information will be stored, collected, or processed in the United States.

## **9. Children’s Privacy**

We do not knowingly target our Services to children under the age of 18. In the event that we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their Personal Information, you can email us at [privacy@redwoodresidential.com](mailto:privacy@redwoodresidential.com) or contact us using the information listed in Section 14.

## **10. Links to Third-Party Websites**

We are not responsible for the practices employed by any websites or services linked to or from the Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be subject to the applicable third party’s Privacy Notice.

## **11. Notice to California Residents**

Subject to certain exceptions, this Section applies to our collection and use of Personal Information if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (“CCPA”), where “Personal Information” has the definition set forth in the CCPA.

This Section describes (1) the categories of Personal Information collected and disclosed by us, (2) your privacy rights under the CCPA, and (3) how to exercise your rights.

Redwood Residential makes the following disclosures regarding the Personal Information Redwood has collected within the 12-month period preceding the Effective Date of this Privacy Notice:

### Sources of Personal Information

We collect Personal Information from the categories of sources detailed in Section 2 above: (a) directly from you; (b) data collected automatically through tracking technologies; and (c) third parties.

### Use of Personal Information

We collect Personal Information for the business and commercial purposes detailed in Section 3 above.

Disclosure of Personal Information

The categories of Personal Information we collect, and third parties to which we disclose, Personal Information for a business or commercial purpose or to whom we sell or share Personal Information are summarized in the chart below. We do not knowingly sell or share Personal Information.

Categories of CA Personal Information We Collect	Categories of Third Parties to Which We Disclose Personal Information for a Business or Commercial Purpose	Categories of Third Parties to Which We May Sell or Share Personal Information
Identifiers	Service providers; Advertising partners; Business partners	We do not sell this category of Personal Information. However, we share this category of information with third parties for purposes of cross-context behavioral advertising.
Personal information, as defined in the California customer records law	Service providers; Business partners	We do not sell this category of Personal Information. However, we share this category of information with third parties for purposes of cross-context behavioral advertising.
Protected classification characteristics under California or federal law.	Service providers; Advertising partners	We do not sell this category of Personal Information. However, we share this category of information with third parties for purposes of cross-context behavioral advertising.
Commercial Information	Service providers; Advertising partners	We do not sell or share Personal Information.

Internet or other similar network activity	Service providers; Advertising partners;	We do not sell or share Personal Information.
Geolocation data	Service providers; Advertising partners; Business partners	We do not sell this category of Personal Information. However, we share this category of information with third parties for purposes of cross-context behavioral advertising.
Sensory Data	Service providers	We do not sell or share Personal Information.
Inferences drawn from other Personal Information	Service providers; Business partners	We do not sell or share Personal Information.
Professional or employment-related information	Service providers; Business partners	We do not sell or share Personal Information.
Sensitive Personal Information	N/A	We do not sell or share Personal Information.

*Data Retention.* We will retain each category of your Personal Information only for as long as necessary to fulfill the purposes described in the “How We Use Personal Information” section above, unless otherwise required by applicable laws. We consider the following criteria to determine how long we will retain your Personal Information, including whether: we need your Personal Information to provide you with the Services you requested; we continue to have a business relationship with you; you have requested information or Services from us; we have a

legal right or obligation to continue to retain your Personal Information; we have an obligation to a third party that involves your Personal Information; our retention or recordkeeping policies and obligations dictate that we retain your Personal Information; we have an interest in providing you with information about our products or services; and we have another business purpose for retaining your Personal Information.

Subject to certain exceptions, if you are a resident of California, you may have the following rights:

<b>Privacy Right</b>	<b>Description</b>
<b>Notice</b>	The right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
<b>Access</b>	The right to know what Personal Information we have collected about you, including (a) the categories of Personal Information; (b) the categories of sources from which the Personal Information was collected; (c) the business or commercial purpose for collecting, selling, or sharing Personal Information; (d) the categories of third parties to whom the business discloses Personal Information; and (e) the specific pieces of Personal Information we have collected about you.
<b>Data Portability</b>	The right to receive a copy of your Personal Information in a portable and readily usable format.
<b>Deletion</b>	The right to have your Personal Information deleted. Note, however, that we may not always be able to comply with your request to delete for specific legal reasons which will be notified to you, if applicable, at the time of your request
<b>Correction</b>	The right to request that we correct any incorrect Personal Information that we collect or retain about you, subject to certain exceptions.
<b>Automated Decision Making</b>	The right to request information about the logic involved in automated decision-making and a description of the likely outcome of processes, and the right to opt out. We currently engage in automated decision-making practices when processing your lease application.
<b>To Opt Out of Sales or Sharing of Personal Information</b>	We may sell or share your Personal Information. You have the right to opt out of the sale or sharing of your Personal Information by clicking on the link "Do Not Sell or Share My Personal Information" link found at the footer of the homepage.
<b>Limit Use of Sensitive Personal Information</b>	We do not use or disclose Sensitive Personal Information other than to provide our Services. However, if we used or disclosed Sensitive Personal Information for other purposes, you may have the right to limit certain uses of Sensitive Personal Information.

Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information. You may also make a request on behalf of your minor child.

You may only make a request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

*Other California Privacy Rights.* Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of Personal Information to third parties for the third parties' direct marketing purposes, if any. To make such a request, please contact us using the information in the Contact Us section below. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

## **12. Exercising your Individual Privacy Rights**

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Privacy Notice, which means we will not deny, or provide a different level or quality of Services, to you, or provide different prices or rates for our Services to you.

To exercise any of the privacy rights afforded to you under applicable data protection law, please submit a request to us by one of the following methods:

- E-mailing us at [privacy@redwoodresidential.com](mailto:privacy@redwoodresidential.com)
- Calling us toll free at 888.344.2232

*Verification:* We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use Personal Information provided in a request to verify the requestor's identity. If you are an authorized agent making a request on behalf of a California consumer, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We endeavor to respond to requests within the time period required by applicable law. If we require more time, 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.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes

This Privacy Notice is available to consumers with disabilities. To access this Privacy Notice in an alternative downloadable format, please [click here](#).

*Appeals:* If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

### **13. Changes to this Privacy Notice**

Please note that we may modify or update this Privacy Notice from time to time, so please review it periodically. We may provide you with an updated Privacy Notice if material changes are made. Unless otherwise indicated, any changes to this Privacy Notice will apply immediately upon posting to the Site.

### **14. Contact Us**

If you have any questions about our practices or this Privacy Notice, please contact us at [privacy@redwoodresidential.com](mailto:privacy@redwoodresidential.com).

You may also write to us at:

**Redwood Residential, LLC.**  
**1 E Wacker Dr | Suite 1600**  
**Chicago, Illinois 60601**  
**Attn: Privacy Officer**