

# Woodspear Properties Privacy Policy

Thank you for visiting the Woodspear Properties (“Woodspear”) website (including any Woodspear-branded and affiliated websites that are both directly linked from this website and display a link to this Privacy Policy, the “Websites”). Your privacy is important to us. To help you better understand our privacy practices, we provide this Privacy Policy, which explains our online information practices and the choices you can make about the way your information is collected and used.

We may change this Privacy Policy at any time without prior notice to you or any other person (via email or otherwise), by posting changes on the Websites. We encourage you to check back and review this Privacy Policy from time to time to remain fully informed of our commitments. This Privacy Policy describes our privacy practices regarding information collected from you, or that you provide to us or third parties on our behalf, including, but not limited to, through the Websites. If you do not agree to the revised Privacy Policy, you are not authorized to access or use the Websites and you must disconnect from and not use the Websites.

## 1. The Information We May Collect:

**A. Traffic Data.** We automatically track and collect general log information when you visit the Websites, including but not limited to your IP address, domain server, operating system, and type of web browser as well as the pages you visit (“Traffic Data”). Traffic Data may or may not personally identify you and is helpful for marketing purposes and for improving your experience on the Websites. We use the Traffic Data to report aggregated activity on the Websites and to better understand the needs of our users so we can make informed decisions regarding the content and design of the Websites. We may collect Traffic Data through various methods including, but not limited to, cookies (which are text files sent to your web browser and stored on your hard disk, to enable us to provide you with a more individualized experience on the Websites and delivery of information), IP addresses, and transparent GIFs or pixel tags (which are small graphic files that allow us to monitor the use of the Websites and our email communications). We may also use Traffic Data, including tracking cookies and retargeting marketing cookies, to provide you with Woodspear-related advertising, including via our third-party advertising partners, and share with our analytics providers (as further described below).

**B. Personal Information.** You may provide us (or a third party on our behalf) with personally identifiable information (“Personal Information”) when you use the Websites (e.g., when you sign up for an account, request a quote, complete a survey, fill out a lease application, request information or a service, sign up for a mailing list, provide feedback) or provide us with such Personal Information offline (e.g., fill out a paper lease application offline). The types of Personal Information collected on the Websites may include, but are not limited to, name, address, e-mail address, phone number, gender, social security number, responses to survey questions, responses to lease application questions, credit card number, employment history, bank account number, geo-location information.

## 2. How We Use and Share Your Personal Information:

If you choose to submit any personal information on any page of the Websites by completing requests for information or any form (for example, providing your name, company name, street or e-mail address or your telephone number or signing up for e-mail updates and alerts), Woodspear may collect, retain, use, and share that information in aggregated or unaggregated form. Woodspear may use your personal information to respond to your queries, to send you e-mail alerts and updates or other marketing information various properties, projects or opportunities, or related information. Woodspear may use the information you provide to provide you with information about Woodspear and about Woodspear’s projects and services, as well as the projects and services of others. Moreover, Woodspear may share your information among Woodspear’s affiliates and with third parties that Woodspear believes may provide services of

interest to you or do provide services to you on our behalf. Also, Woodspear may from time-to-time transfer information to third parties who analyze such information on behalf of Woodspear. Some of these companies and some of Woodspear's affiliates may reside in countries other than your own. As a result, your personal information may be transferred out of the country in which you reside.

### **3. Children's Privacy:**

Except with respect to collection of specific data required to determine unit occupancy within our online leasing process, we do not collect information on the Websites from those we know are under 13, and the registration page for the Websites requires visitors wishing to become Website registrants to be at least 18 years of age. No part of the Websites is structured to attract anyone under 13. By using the Websites, you represent that you are not under 13 years of age.

### **4. Links to Third Party Websites:**

**A. General.** The Websites may offer links to third party websites that may have information policies and practices different from ours (e.g., utility connection websites, rent easy-pay websites, or any Woodspear-branded websites that are operated by third parties and do not link to this Privacy Policy). The fact that we have provided a link to a site is NOT an endorsement, authorization, sponsorship, or affiliation by us with respect to such website, its owners, or its providers. We do not control and are not responsible for the privacy policies or practices or the content of any third-party websites.

**B. Locator Services.** If you found us through a locator service, please be aware that locator services are independent contractors and are not our employees or agents, even though they may initially process rental applications and fill out lease forms. You should require any locator services you use to furnish you their own privacy policies.

### **5. Advertising and Opt-Out:**

Our third-party advertising partners may use certain information about your visits (e.g., excluding name, address, email address or telephone number, but including but not limited to geo-location information and Traffic Data) to this and other websites, mobile websites and/or mobile applications across your various devices, to provide content and advertisements about Woodspear to you across those various devices. If you would like more information about this practice and to know your choices with respect to it, please: (1) visit the Digital Advertising Alliance's opt-out page (currently available at <http://www.aboutads.info/choices/>) or the Network Advertising Initiative's opt-out page (currently available at <http://www.networkadvertising.org/choices/>) to learn how to opt out of having your information collected in browsers for ad serving purposes.

### **6. Non-U.S. Residents:**

We provide services within United States. We do not provide services in the European Union. If you reside in the European Union and believe you have mistakenly entered information in our site and wish to have that data deleted, we will honor that request to the extent allowed by applicable law. Please forward any such request here: [WSinfo@woodspearproperties.com](mailto:WSinfo@woodspearproperties.com).

If you provide Personal Information to us, it may be transferred to and processed on computers in the U.S. and other countries. Do not provide Personal Information to us if you do not want this information to be transferred to the United States or to other countries, or if the laws in your country restrict these types of transfers. Your provision of Personal Information to us will be handled in accordance with this Privacy Policy. Your provision of Personal Information to us through the Website means that you agree to this Privacy Policy.

## 7. Website Security:

We use reasonable security safeguards to protect the Personal Information that we collect from unauthorized access. However, due to the design of the Internet, we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties. While no one can guarantee against identity theft or the misuse of personal information, protecting the information you provide us is a high priority to our company and staff. If you ever have concerns about this issue, please feel free to share them with us.

## 8. YOUR CALIFORNIA RIGHTS:

California residents have certain rights with respect to their personal information, as described below. We are required by law to verify your identity in connection with any request in order to prevent unauthorized access of your data. This may require you to provide an answer to one or more challenge questions. Please note that your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege). We will try to comply with your request as soon as reasonably practicable. Requests to exercise these rights may be granted in whole, in part, or not at all, depending on the scope and nature of the request and applicable law. Where required by applicable law, we will notify you if we reject your request and notify you of the reasons, we are unable to honor your request.

- **Right to Know and Access Information:** You may access information we maintain about you using the methods provided below. If we grant your request, we will provide you with a copy of the personal information we maintain about you in the ordinary course of business. This may include what personal information we collect, use, or disclose about you. We may not fulfill some or all of your request to access as permitted by applicable law.
- **Deletion of Information:** You may request that we delete your personal information. Depending on the scope of your request, we may refrain from granting your request, as permitted by applicable law. For example, we may be legally required to retain your information in our business records. You may submit a deletion request using the methods provided below.
- **"Do Not Sell:"** We do not sell your personal information, including as defined by California law.
- **Non-Discrimination:** We will not discriminate against you, in terms of price or services that we offer, if you submit one of the requests listed above.

**A. Authorized Agent:** California residents may use an authorized agent on their behalf to exercise a privacy right discussed above. If you are an authorized agent acting on behalf of a California resident to communicate with us or to exercise a privacy right discussed above, you must be able to demonstrate that you have the requisite authorization to act on behalf of the resident and have sufficient access to their laptop, desktop, or mobile device to exercise these rights digitally. If you are an authorized agent trying to exercise rights on behalf of an WOODSPEAR user, please contact us at the contact information below with supporting verification information, which includes a valid Power of Attorney in the State of California, proof that you have access to the consumer's interface, and proof of your own identify.

**B. To Exercise Rights:** To exercise the rights described above, please visit our woodspearproperties.com Contact page or contact us using the information below. Should you have any questions or concerns regarding your California rights or this privacy policy, you may also contact us using the contact information below.

- **TOLL-FREE NUMBER:** 1-888-882-1980
- **EMAIL:** CPrivacy@woodspearproperties.com

**9. ADDITIONAL CALIFORNIA PRIVACY RIGHTS:** For purposes of California residents, this Privacy Policy pertains to all information collected online, including through the Websites. California law permits customers of Woodspear who are California residents to request certain information regarding Woodspear's disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please see "To Exercise Rights" above.

**10. Google Analytics:** The Websites use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the Websites analyze how users use the Websites. The information generated by the cookie about your use of the Websites (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Websites, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use the full functionality of the Websites. By using the Websites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

**11. E-Mail Consent:** When you provide Personal Information to us through the Websites, you are consenting to receive email from us, which may include, but is not limited to, password requests, information relating to your leasing application, and information you request. In addition, you may receive commercial email messages from us, including marketing announcements. If you do not wish to receive future commercial email messages from us, you may opt out of receiving such commercial email messages by following the link and instructions provided to you in such email messages. This opt out applies to commercial email messages only. If you are an Woodspear resident, you consent to receive and we may still send you email regarding operational matters pertaining to your apartment, the Woodspear community in which your apartment is located or your lease with us. If you are a leasing applicant, you consent to receive, and we may still send you email regarding your application process.

**12. Terms of Use.** Please take the time to read our [www.woodspear.com](http://www.woodspear.com) Privacy Policy including the limitations on damages and application of the law of the State of Colorado. These terms govern our interactions as a legal contract, and we welcome and encourage the time you spend becoming familiar with these legal terms as much as we welcome the time you spend on our web site and your support of Woodspear.

**13. Definitions.** When we say "we" or "us" or "our" or "Woodspear" in this Privacy Policy, we mean Woodspear Properties, our affiliates, and those agents we use to provide services on our behalf. When we say "Websites", we mean [www.woodspearproperties.com](http://www.woodspearproperties.com) and all other websites developed, owned, or maintained by Woodspear and its affiliates.

#### **How To Contact Us:**

Should you have other questions or concerns about this Privacy Policy (other than California-specific rights addressed above), please email us at [WSinfo@woodspearproperties.com](mailto:WSinfo@woodspearproperties.com).