

MADERA PRIVACY POLICY

Last Updated: July 1, 2024

Madera Residential LLC and its affiliated entities (referred to herein as “Madera,” “we,” “us,” or “our”) are committed to protecting the privacy of personal information obtained by our users or consumers (referred to as “you” or “your” in this Madera Privacy Policy). This policy will provide you with the categories of personal data processed and shared with third parties, the purpose for processing personal data, categories of third parties with whom we share personal data, how you may exercise your consumer rights including the process by which you may appeal our decision regarding your request, and a description of methods in which you may submit requests to exercise your consumer rights. This policy is applicable to any and all forms completed in relation to our products and services (“Services”) and all Madera sites including maderaresidential.com, maderalife.com, and any subdomains thereof (collectively the “Sites”).

By accessing our Sites or utilizing our Services, you consent to the collection, use, processing, and treatment of consumers’ personal data as outlined in this policy. If you do not agree with our policy, you may choose not to use our Sites or Services.

Definitions

“Child” means an individual younger than 13 years of age.

“Consent,” when referring to a consumer, means a clear affirmative act signifying a consumer’s freely given, specific, informed, and unambiguous agreement to process personal data relating to the consumer. The term includes a written statement, including a statement written by electronic means, or any other unambiguous affirmative action.

“Controller” means an individual or other person that, alone or jointly with others, determines the purpose and means of processing personal data.

“Cookie” is a file or segment of data that identifies a unique user over time and across interactions with a website, sent by the web server through a browser, stored on a user’s hard drive, and sent back to the server each time the browser requests a web page.

“Personal Data” means any information, including sensitive data, that is linked or reasonably linkable to an identified or identifiable individual. The term includes pseudonymous data when the data is used by a controller or processor in conjunction with additional information that reasonably links the data to an identified or identifiable individual. The term does not include deidentified data or publicly available information.

“Pixel Tags” or “Web Beacons” are pieces of invisible code embedded in our Services that collect information about engagement on our Services.

“Process” or “processing” means an operation or set of operations performed, whether by manual or automated means, on personal data or on sets of personal data, such as the collection, use, storage, disclosure, analysis, deletion, or modification of personal data.

“Processor” means a person that processes personal data on behalf of a controller.

“Sale of personal data” means the sharing, disclosing, or transferring of personal data for monetary or other valuable consideration by the controller to a third party.

“Sensitive data” means a category of personal data that includes personal data revealing racial or ethnic origin, religious beliefs, mental or physical health diagnosis, sexuality, or citizenship or immigration status; genetic or biometric data that is processed for the purpose of uniquely identifying an individual; personal data collected from a known child; or precise geolocation data.

“Sites” generally refers to all Madera websites

“Third party” means a person, other than the consumer, the controller, the processor, or an affiliate of the controller or processor.

Categories of Personal Data Processed and Shared with Third Parties

Madera collects personally identifiable information on our Sites only if you provide it. Madera may collect various types of information, both personal and anonymous, through our Services and Sites. The information is automatically gathered from your usage of our Sites and Services as well as from your entry of information on our

Sites. Madera collects certain Personal Data that can be used to uniquely identify you as an individual or contact you directly. We will follow all applicable requirements under applicable laws with respect to Sensitive Data collected.

Contact Information: We may collect your name, alias, address, telephone number, email address, and emergency contact details to facilitate effective communication and ensure we can reach you for any service-related issues. This information is essential for processing your requests, providing customer support, and ensuring your needs are met promptly. Additionally, it helps us keep our records accurate and up to date.

Other Personal Identifiers: This may include your username, social security number, taxpayer identification number, driver's license number, passport number, identity cards, student cards, resident identification numbers, and date of birth. These identifiers are used to verify your identity, prevent fraud, and maintain accurate records. Ensuring the authenticity of these details helps us provide secure and reliable Services while complying with legal and regulatory requirements.

Financial and Insurance Information: We may gather comprehensive financial details, including rent payment details, insurance policy numbers, credit history, background checks, pay stubs, and other financial documentation. This information is critical for processing transactions, managing your financial interactions with us, and ensuring compliance with relevant financial regulations. It also aids in assessing your financial standing for rental agreements and other services. Although we do not directly gather bank account numbers and credit card information, they are passed to third-party partners for payment processing purposes.

Demographic Information: We may collect demographic information such as age, race, ethnicity, ancestry, national origin, citizenship status, marital status, gender, and veteran or military status, in each case subject to applicable laws.

Commercial Information: This may include records of personal property, services purchased, obtained or considered, rental history, utility bills, insurance claims, and other related information. By analyzing your transaction history, we can offer personalized services, anticipate your needs, and enhance your overall experience. This data is crucial for maintaining accurate billing records and providing you with detailed account statements.

Internet or Other Electronic Device Information: We may collect information about your devices, browsing history, search queries, Internet Protocol (IP) address, cookie identification numbers, and interactions with our websites. This data helps us improve the usability and functionality of our digital platforms, providing a seamless online experience. We use this information to identify trends, troubleshoot issues, and enhance the security of our Sites. This type of information is gathered through cookies to help us improve the usability of the Sites.

Cookies/Pixel Tags/Web Beacons: We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags or web beacons, and other technologies to automatically collect information through your use of service with active user consent at the time of usage.

Social Media Plugins: We may incorporate social media application program interfaces (plug-ins) from social networks including Facebook, Instagram, Twitter, LinkedIn, Google +, Xing, Tumblr, Pinterest and others into the Site. You may have the option to sign into our Site using your Facebook or other social mediate site (SMS) login.

Sensory Data: We may process photographs, videos, and audio recordings, especially those submitted during maintenance requests. This multimedia data helps us address your issues efficiently and document the condition of properties. If you use our mobile app, this may require you to grant us access to your device's camera. This ensures that we can provide timely and effective maintenance services.

Location Information: We may collect data about your location when you use our App, Sites, or other aspects of our Services to communicate with us with active user consent at the time of usage. This information enables us to provide location-based services, improve the relevance of our offerings, and ensure we can assist you promptly when you are on-site. It also aids in enhancing security measures and service delivery efficiency.

Employment or Other Professional Information: This may include your educational background, employment history, job titles, institutions attended, diplomas, curriculum vitae (CV) details, resume, salary history, and income. This data is collected for verification purposes related to employment and tenancy applications. It helps us assess your qualifications, process job applications, and ensure compliance with employment laws.

Environmental, Social, and Governance (ESG) Data: We may monitor and report on energy usage at site levels and within individual tenancies. This data helps us manage our environmental impact, improve sustainability efforts, and adhere to environmental regulations and standards. It also supports our initiatives in reducing carbon footprints and promoting eco-friendly practices within our communities.

Survey Responses: We may collect your responses to surveys conducted for research purposes. This information provides valuable insights into your preferences, satisfaction levels, and needs, allowing us to enhance our Services. Survey data helps us identify areas for improvement, develop new offerings, and ensure we are meeting your expectations effectively.

Sweepstakes or Contests: We collect contact information you provide for any sweepstakes or contests that we may offer. In some areas, we are required to publicly share information regarding the winners.

Trade Shows, Conferences, and Other Events: We collect contact information from individuals when we attend or host trade shows, conferences, and other events.

Job Applications and Recruiting: If you apply for employment with us, we collect information that will be used to assess your skills, qualifications, and interests to determine alignment with career opportunities we have and to communicate with you regarding the status of your application. If you are offered and accept a position with us, your application information will become part of your personnel file.

Anonymous Information: We may use anonymous information for any reason we deem appropriate and share this information including usage data, platform types, number of clicks, etc. with interested third parties to assist them in learning usage patterns for certain services.

Purpose for Processing Personal Data

Madera uses the information you submit on our Sites to perform the services or activities you request and to present its content to you. We utilize personal data to provide tailored services, improve our offerings, and ensure compliance with legal requirements. Your data helps us understand your preferences, enhance your user experience, and address any issues efficiently. We also use personal data for various specific purposes:

Engaging with Prospective Residents: We process your data to provide property tours, contact prospective residents, and manage communication regarding your property preferences. This ensures that we can assist you effectively in finding and leasing an apartment.

Applications and Contracts: We evaluate applications, authenticate identities, perform credit checks, background checks, and other screenings necessary for compliance with our policies. This helps us ensure that prospective residents are financially solvent and meet our leasing criteria. We use your information to fulfill our obligations that arise under contracts between you and us, including billing and collections.

Operations and General Business : We process data to contact you, manage payments, provide you with notices about your account, perform debt collection, provide maintenance services, manage properties, notify you of changes to our policies, Sites, terms and Services, improve Sites and Services, develop new products, to conform to legal requirements, and in any other way we may describe that prompts you to provide information. This helps us understand how we can better assist prospective and current residents, ensuring smooth operations and addressing resident needs effectively.

Marketing and Surveys: We use your information to communicate with you about our properties and promotions and to conduct resident surveys to gain your opinions. This allows us to understand your experience and

preferences, enhancing our Services and marketing efforts. We may also use third-party technologies to deliver ads relevant to your interests.

Security and Legal Obligations: We process data to detect security incidents, protect against fraudulent or illegal activities, identify irregular Site behavior, and report such activity to comply with legal requirements.

Environmental, Social, and Governance (ESG) Initiatives: We monitor and report on energy usage to support climate change and carbon reduction initiatives. This helps us align with legal obligations and our commitment to sustainability.

Performance and Functionality: We use your personal data to assess the performance of our Sites and Services and to offer you enhanced functionality when using our Services. We also use this information to estimate our audience size, usage patterns and recognize when you return to our Sites.

Analytics: We may use technology or other third party tools to process analytics information on our Services to allow us to better understand the behavior of our visitors to our websites are improve and personalize our Services.

These purposes are aligned with our legitimate business interests, contractual obligations, and legal requirements, ensuring that your data is processed securely and appropriately.

Categories of Third Parties with Whom We Share Personal Data

We may use third parties to perform Services related to the Services or activity requested, such as payment processing for any applicable fees associated with an event or transaction. These third parties have access to the information you submit only to perform these tasks on our behalf and are bound by confidentiality obligations.

Madera Affiliates: For the purpose of any necessary collaboration.

Service Providers: We disclose your Personal Data to our third parties who assist us with providing our Services only to the extent necessary for them to facilitate service. These service providers include, but are not limited to, Site hosts, internet service providers, customer support specialists, payment processors, researchers and data analytics providers, vendors who provide IT support, legal advisors, on-site service providers such as concierge, trash pick-up and dog-walking providers. These service providers may use your Personal Data for their own purposes and legal obligations and would then be considered separate data controllers.

Business Partners: We may disclose your Personal Data with business partners to provide you with a product or service you have requested. We may also share your Personal Data with business partners with whom we jointly offer products or services.

Property Owners: We disclose Personal Data to the Owners of the properties we manage. Owners may use your Personal Data for their own purposes and legal obligations and are therefore considered separate data controllers.

Social Networks: We may disclose your Personal Data with our social networks including advertising partners or sponsors of events and promotions in which you have expressed interest or for which you have registered.

Third Party Apps: You, your administrator, or other Service users may choose to add new functionality or change the behavior of the Services by installing third-party apps within the Services. Doing so may give third-party apps access to your account and information about you like your name and email address, and any content you choose to use in connection with those apps.

Links to Third Party Sites: The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third-party sites, your information is governed by their privacy policies, not this one.

Third Party Services: We may offer you the ability to interact with or disclose information to third parties through the Services. For example, we may offer the ability to log in to the Services via a third-party service.

Third Party Widgets: Some of our services contain widgets and social media features, such as the Twitter "tweet" button or Facebook "like" button. These widgets and features may collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly.

With Your Consent: We disclose information about you to third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites.

Successor or Buyer: In the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Madera's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding in which personal data held by Madera about our visitors is among the assets transferred.

Government Entities: We may disclose your information with government entities for our administrative purposes or to meet statutory or regulatory requirements.

Compelled Disclosure: Madera reserves the right to use or disclose information and personal data provided on our Sites if required by law or if we reasonably believe that such use or disclosure is necessary to 1) protect Madera's rights and/or comply with judicial proceedings, court order, or the legal process; 2) enforce Madera's Terms of Service or investigate potential violations thereof; 3) protect against fraudulent, abusive, unauthorized, or unlawful use of Madera's Services and Sites; and 4) protect the safety or security of our users, employees, or data.

We may also share your information with third parties as appropriate and permitted by law. Your ability to exercise your consumer rights concerning your Personal Data are described below.

How You May Exercise Your Consumer Rights, Including the Appeal Process

You have the right to access, correct, delete, or restrict the use of your personal data. To exercise these rights, you can submit a request through our provided contact details. You may only submit a request without charge twice within a 12-month period. Your request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or that the requestor is your authorized representative; and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will verify your identity before processing any request to ensure your data's security. We will use reasonable efforts to respond to your request within forty-five (45) days of receipt. If we require additional time, we will inform you of the reason and the extension period in writing prior to expiration of the forty-five (45) day deadline. We are committed to addressing your concerns and ensuring your data privacy. We provide you with options, information, and choices to express your preferences as required under applicable law. We may deny your deletion request if retaining the personal data is necessary for us to complete the transaction for which we collected the personal data; identify and/or repair errors that impair the functionality of our Services; detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; make other lawful uses of the personal data that are compatible with the context in which you provided it; and comply with a legal obligation

Appeal Process: If you disagree with our response to your request, you have the right to appeal. To exercise this right, submit an appeal request using the same method as your original request. Contact us via the details provided in the "Contact Us" section below.

Description of Methods You May Use to Submit Requests to Exercise Your Consumer Rights

Email Consent and Opt-Out: Each of our marketing emails includes an unsubscribe link for managing your email preferences. Please be aware that if you are a resident of one of our properties, you need to separately opt out through your property's specific site. To stop receiving non-essential emails, click the unsubscribe link in any email you receive from us. However, please note that transactional emails related to your requested products or services will still be sent. You may also receive non-promotional communications from us that you cannot opt out of.

Additionally, we may respond to your inquiries or communicate with you regarding other transactions as needed. Opt-out instructions for third-party sites where you are registered are also available. For further assistance, please contact us using the details in the "Contact Us" section below.

Phone Calls: If you receive unwanted phone calls, you can opt out by following the instructions provided during the call or by contacting us using the details in the "Contact Us" section below.

Text Messages: To opt out of receiving future text messages, follow the instructions in the text message received or contact us using the details in the "Contact Us" section below

Mobile Devices: Adjust your mobile device settings to opt out of push notifications and location-based information collection through our mobile application.

Do Not Track: Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Our websites may not respond to all browser-based DNT signals; however, our websites do respond to the Global Privacy Control ("GPC") to opt out of "sales" of personal information and targeted advertising in certain locales.

Cookies and Personalized Advertising: Manage cookie preferences and opt-out of personalized advertising by adjusting settings on our Sites or using browser controls. Your choices are browser-specific. You may be able to restrict the use of cookies by adjusting your browser's privacy options. However, if you select this setting, you may be unable to access certain parts of our Site. Some content on our Site are served by third parties that may also use cookies or other tracking technologies to collect information about you that we have no control over.

Global Privacy Control: Exercise your opt-out right using Global Privacy Control (GPC) signals supported by certain browsers or extensions.

Ad Industry Opt-Outs: Access websites to opt out of receiving targeted ads from data partners and advertising networks participating in self-regulatory programs.

Data Portability: Data portability is the ability to obtain some of your information in a format you can move from one service provider to another. Should you request it, we will provide an electronic file of your basic account information and the information you create on the spaces under your sole control.

Other Methods: For other requests related to accessing, correcting, deleting, or restricting your Personal Data, please contact us using the details in the "Contact Us" section below

Data Security and Retention

We use industry standard technical and organizational measures to secure the information we store. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. The security of your information also depends on you. Be sure to keep any passwords you have confidential to prevent unauthorized access to your Personal Data. We do not sell or rent personal data and share it only as necessary for operational purposes or as outlined in our privacy policy, with options available for users to manage their privacy preferences and rights. Data retention aligns with legal requirements, and after this period, we securely dispose of or anonymize information to prevent unauthorized access.

Minors/Children

Our Sites are not intended for minors under the age of 13. We do not knowingly collect Personal Data from children without parental consent. If we discover that we have collected such data, we will take commercially reasonable steps to delete it promptly. If you are under the age of 13, please do not send any personal information about yourself such as your name, address, telephone number, or email address. Parents or guardians can contact us if they believe their child has provided Personal Data without consent. We are committed to protecting children's

privacy and complying with applicable laws and regulations. We encourage parents to monitor their children's online activities and educate them about safe internet practices.

Fair Housing Policy Statement

Madera Residential, LLC does not discriminate based upon race, color, religion, sex, disability, familial status, national origin or under the protected classes in ordinances passed in particular municipalities in which we do business. Madera Residential, LLC further adheres to the Joint Statements of The Department of Housing and Urban Development and The Department of Justice pertaining to Reasonable Accommodations and Reasonable Modifications under the Fair Housing Act.

In addition, Madera Residential, LLC adheres to the Department of Housing and Urban Development Guidance on Service Animals and Assistance Animals for People with Disabilities.

Digital Millennium Copyright Act (“DMCA”)

Notice pursuant to 17 U. S. C. Section 512, as amended by Title II of the Digital Millennium Copyright Act (the “Act”), Madera reserves the right, but not the obligation, to terminate your right to use any Madera Sites if Madera determines in its sole and absolute discretion, that you are involved in any activity that may be infringing, including alleged acts of infringement, regardless of whether the material or activity is ultimately determined to be infringing. Madera accommodates and does not interfere with standard technical measures used by copyright owners to protect their materials. In addition, pursuant to the Act, Madera has implemented procedures for receiving written notification of claimed infringements and for processing such claims in accordance with the Act.

Consent and Changes to this Privacy Policy

By using this Site, you consent to our collection, use, and disclosure of the personal data described. We reserve the right, at our sole discretion, to modify, add, or remove contents of this Policy from time to time. We may update this policy periodically to reflect changes in our practices, technology, legal requirements, and other factors. The updated policy will be effective when posted on our Sites, and your continued use of our Sites and Services indicates your acceptance of the revised policy. We may, but are under no legal obligation to, provide you notice of such modifications to this Privacy. We encourage you to review this policy regularly to stay informed about how we protect your data.

In case of significant changes, we may notify you through email or other communication channels. Your disclosure of Personal Data through the Sites constitutes your affirmative consent that we may contact you by email to provide you with information and notices relating to the property.

Your continued use of our Sites and Services following the posting of changes constitutes your acceptance of such changes.

You may withdraw your consent to our processing of your Personal Data. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us at:

Madera Residential, LLC
5214 68th Street, Suite 201
Lubbock, Texas 79424
Phone: (806) 798-0888
Email: privacy@maderaresidential.com

We are committed to addressing your inquiries and ensuring your data privacy and security. Thank you for trusting Madera with your Personal Data.