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## PRIVACY POLICY & CCPA

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Cresleigh Homes (“Cresleigh Homes” or “we”, “us” or “our”) located at 1410 Rocky Ridge Drive., Ste 120 Roseville, CA 95661 is committed to protecting your privacy. The information you provide to “Cresleigh Homes” is utilized in order for us to (among other things) provide you with the highest level of customer service reflective of the quality of our brand.

This Privacy Policy (“Policy”) applies to our offline and online data collection practices, including when you visit our website at [www.cresleigh.com](http://www.cresleigh.com) and any website owned, operated, or controlled by us (collectively the “Site”), visit or live at any of our properties, own property in any of our communities, visit our sales offices at any location, and make inquiries about buying or renting property in our communities, contact us regarding any of our properties by phone, chat or email, subscribe to our mailing lists or when you engage with us on social media.

This Policy is subject to our Terms of Use located at: <https://cresleigh.com/terms>. We may update this Policy from time to time, as specified in the “Changes to This Privacy Policy” section below.

California state law confers certain rights relating to personal information to its residents. **If you are a California resident, please also see our California Consumer Privacy Section in this Policy located at: <https://cresleigh.com/privacy-policy>.**

### **Your Consent**

You should read this entire Policy before submitting information to us in any form or using our Site. Whenever you submit personal information to us, you consent to the collection, use, disclosure, transfer, and storage of that information in accordance with this Policy.

We may make full use of all information that is de-identified, aggregated, or otherwise not in personally identifiable form.

### **Information Collection and Use of Information**

We collect personal information about you in the following ways: 1) from you when you voluntarily submit information directly to us; 2) using automated technology, including when you visit our Site, social media, or properties/communities or interact with our electronic advertisements or communications; and 3) using third party sources, including our service providers, analytics providers, through social media and other websites or services we interact with. Automated technology collects information from your computer or mobile device and includes cookies, web beacons, local shared objects, or other similar technology. More information is given below in the “**Cookies and Other Technology**” section below.

All personal information may be used for the purposes stated in this Policy. We will retain your personal information for the period necessary to fulfill that purpose and as otherwise needed to comply with applicable law and internal company policies.

We may combine data collected from third party sources.

We collect, use, and disclose your personal information as described in the chart in **Annex 1** below.

[Our third-party providers are bound by confidentiality obligations and are restricted to only using the data to provide our business with applicable services.]

### **Retention of Data**

We will retain your personal information (collected through offline and online methods) for as long as it is necessary for the purposes described in this Policy. We will also retain and use your personal information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

### **Intended Audience of Websites; COPPA Compliance**

We are in compliance with the requirements of the Children’s Online Privacy Protection Act (“COPPA”). We do not knowingly collect information from minors in the United States or elsewhere with or without the consent of their parents or guardians. If you are not 16 or older, you should not visit or use our Site or social media accounts. If you become aware that a child has provided us with personal information without appropriate consent, then please contact us using the details below so that we can take the appropriate steps in accordance with our legal obligations and this Policy.

### **Email Marketing**

If you no longer wish to receive email marketing communications from us, you may opt-out of receiving marketing-related emails by using the unsubscribe method provided in our communications (e.g., by clicking on the “unsubscribe” link in the email to unsubscribe) or by contacting us at [privacy@cresleigh.com](mailto:privacy@cresleigh.com), or 844-978-8945. Please note that unsubscribing from our promotional material will not prevent us from contacting you for other reasons, such as responses to customer service inquiries, or information about a community or plan type for which you have expressed interest in.

### **Security**

We take reasonable appropriate steps to protect personal data from loss, misuse and unauthorized access, disclosure, alteration or destruction, whether in transmission or storage. The transmission of information via the internet is not completely secure. Although we strive to protect your personal information in accordance with this Policy, we will not be liable for disclosure of personal information obtained due to errors in transmission or security breaches.

### **Cookies and Other Technology**

A “cookie” is a small text file that is placed onto an Internet user’s web browser or device and is used to remember and/or obtain information about the user. A “web beacon” is a small object or image that is embedded into a web page, application, or email and is used to track activity. They are also sometimes referred to as pixels and tags.

To find more information about cookies and for instructions on how to disable them please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or visit the help section of your browser. Most browsers are initially set to allow cookies, but also offer the option to restrict cookies or warn you of their use. By disabling cookies, you won’t be able to enjoy the convenience provided by our customization.

### **THIRD PARTY ADVERTISING AND ANALYTICS DISCLAIMER**

We and/or third parties including third-party advertising companies and service providers on our behalf, may use cookies, web beacons and other similar technology, to collect information from you such as your activities on the Site for the purposes described in this Policy including analytics, targeted advertising, monitoring performance, and improvement of our Site (traffic, errors, page load time, popular pages, etc.)

Examples of our third-party service providers to help deliver our services or to connect to our services include:

Google Analytics and Google Ads: We use Google Analytics to understand how our website, services, advertisements and products perform and how you use them. We have already entered into a service provider addendum with Google. However, if you would like to take additional precautions to opt out of Google Analytics and Ads, you can opt out of Google Analytics by installing Google’s Opt Out browser add on: <https://tools.google.com/dlpage/gaoptout> and opt out of interest-based Google ads using <https://adssettings.google.com/u/0/authenticated>. To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy/>.

Facebook Pixel and Facebook Ads: We use Facebook Pixel to understand how our website, services, advertisements, and products perform and how you use them. We use Facebook Ads to advertise and market our services to you. We have already enabled the Limited Data Use feature with respect to Facebook Pixel. To learn more about how Facebook uses your data please visit <https://www.facebook.com/privacy/explanation> or log on to your Facebook account and access your settings. To understand more about Facebook advertising and manage your preferences please visit <https://www.facebook.com/about/ads>.

**Remarketing and Advertising Opt-out:** We use remarketing services to inform, optimize, and serve ads on third-party websites to you based on your use of our Site and social media. For more information regarding targeted advertising and to opt out of sharing your

information with third-party companies engaged in targeted advertising, including social networking sites visit the AdChoices website powered by the Digital Advertising Alliance (DAA) at <http://optout.aboutads.info/?c=2&lang=EN>. If you choose to opt out, you will continue to receive advertisements but they will not be tailored to your interests.

This Policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, which are covered by such third parties' privacy policies. For more information, we encourage you to check the privacy policies of these third parties to learn about their privacy practices.

### **External Links**

We may make available third party applications through our Site and social media applications for your use. Links to such applications, any other websites included in this Site or links on our social media accounts operate with privacy policies beyond our control. Unless otherwise indicated, once you have left our Site or our social media account, all use of information you provide is governed by the privacy policy of the other website's or social media account's operators. We are not responsible for any transactions that occur between you and a third-party website or social media account.

### **Contact Us**

If you have any questions or concerns about this Policy, please contact us at [privacy@cesleigh.com](mailto:privacy@cesleigh.com)

### **CALIFORNIA CONSUMERS ONLY: Your California Privacy Rights**

The purpose of this section is to inform California residents from whom we may collect personal information about certain rights California affords to its residents with respect to personal information.

### **RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED, DISCLOSED OR SOLD**

You have the right to request that we disclose to you the following information about personal information we collect from you:

- categories of personal information collected;
- categories of sources of personal information collected;
- the business or commercial purpose for collecting or selling personal information;
- the categories of third parties with whom we share personal information; and
- the specific pieces of personal information we have collected about you over the past 12 months.

You also have a right to know if we have sold or disclosed your personal information for a business purpose over the past 12 months and, if so, the categories of personal information sold or disclosed and the categories of third parties to whom the personal information was sold or disclosed, along with the business or commercial purpose for which the personal information was sold or disclosed.

### **Requests to Know**

To make a request for any of the information set forth above (a “Request to Know”), please submit a verifiable consumer request pursuant to the instructions below. You may only make a Request to Know twice within a 12-month period. We will acknowledge your Request to Know within 10 business days and will attempt to respond substantively within 45-90 days.

The Request to Know must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected, sold or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request.

You can make a Request to Know the personal information we have about you in the following ways:

- You may make a request here: [privacy@cresleigh.com](mailto:privacy@cresleigh.com)
- You may also make a request by phone by contacting us at 888-397-0118.

Once we receive your Request to Know, we will begin the process to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records. You will be asked to provide us with two or three pieces of information that will help us to verify your identification.

### **Information Collected**

Within the past 12 months, we have collected the categories of personal information about California consumers as described in this Policy in the section labelled “Information Collection and Use of Information.”

### **Information Sold or Disclosed**

We have not sold any personal information to third parties for a business or commercial purpose in the preceding 12 months.

We have disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding 12 months:

- Personal Identifiers
- Commercial Information
- Internet/Network Activity
- Biometric Information

For information regarding the categories of third parties with whom we have disclosed these categories of personal information, please review Annex 1.

We do not knowingly sell the personal information of minors under 16 years of age.

### **RIGHT TO REQUEST DELETION OF PERSONAL INFORMATION**

You have the right to request the deletion of your personal information collected or maintained by us (“Request to Delete”), subject to certain exceptions permitted by law. To make a Request to Delete, please submit a verifiable consumer request pursuant to the

instructions below. We will acknowledge your Request to Delete within 10 business days and will attempt to respond substantively within 45-90 days.

A Request to Delete requires two steps: 1) making the Request to Delete and 2) confirming that you want your information to be deleted.

You can make a Request to Delete in the following ways:

- You may make a request here – [privacy@cesleigh.com](mailto:privacy@cesleigh.com)
- You may also make a request by phone by contacting us at **884-978-8945**.

Once we receive your request to delete, we will need to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records. If we cannot verify your identity, we will not be able to respond to your request. If the information requested to be deleted is necessary for us to maintain, we will not be able to comply with your request and will notify you this is the case.

We will retain correspondence, documents and information related to any Request to Know, Request to Delete, or Request to Opt-Out for 24 months as required by law.

### **RIGHT TO OPT-OUT OF SALE OF PERSONAL INFORMATION**

As explained in Annex 1 of this Policy, we and our third-party partners may collect and share your data with third parties for our business purposes. This type of sharing may be considered a “sale” under the CCPA. You can control the information shared about you and request an opt-out.

You can make a Request to Opt Out in the following ways:

- Email us at [privacy@cesleigh.com](mailto:privacy@cesleigh.com) – **please include your full name and phone number**
- You may also make a request by phone by contacting us at **884-978-8945**

### **Cookies**

As explained in our “Cookies and other technology” section, you can opt out of cookies using your browser.

### **Please Note:**

- Opt-outs are device and browser based. You must opt out on each device and each browser where you want your choice to apply.
- Opt-outs maybe stored via cookies. If you clear cookies, your opt-out may no longer be valid and you must opt out again where you want your choices to apply.
- We may still share your information with our service providers that help us perform functions that are necessary for our business such as vendors that host our Site, analytics processors, etc. These entities are contractually obligated to keep this information confidential and not use it for any purpose other than for the services they provide to our business.
- You may still receive ads from us that are not tailored to your interests.

### **ADDITIONAL OPTIONS TO OPT-OUT OF SALE**

In addition to the above options to opt out of the “sale” of your information under the CCPA as described above, you have controls and choices with respect to collection and use of your information by third parties. These are summarized for you below. We do not control or maintain opt-out mechanisms for third party companies and are not responsible for their operation.

#### **Online Behavioral Advertising Opt-Out**

You can opt out of sharing your information with third-party companies engaged in online behavioral advertising including social networking sites such as Google and Facebook using the following tools provided through the AdChoices website powered by the Digital Advertising Alliance (DAA):

For websites: <http://optout.aboutads.info/?c=2&lang=EN>.

For mobile apps: <http://www.aboutads.info/appchoices>

#### **Google Opt-Out**

You can opt out of Google Analytics by installing Google’s Opt Out browser add on: <https://tools.google.com/dlpage/gaoptout>. You can opt out of interest-based Google ads using <https://adssettings.google.com/u/0/authenticated>.

#### **Facebook Ad Preferences**

To understand more about Facebook advertising and manage your preferences, please visit <https://www.facebook.com/about/ads>. Login to Facebook and go to Settings > Ads > Ad Settings (web) or Ad Preferences > Ad Settings (app) for more information.

### **RIGHT TO NON-DISCRIMINATION FOR EXERCISING CONSUMER PRIVACY RIGHTS**

You have the right not to receive discriminatory treatment for exercising your privacy rights conferred by the California Consumer Privacy Act, including by exercising the rights specified herein.

### **AUTHORIZED AGENT INFORMATION**

You may designate an authorized agent to make a request on your behalf under the California Consumer Privacy Act.

Authorized agents can make requests under the California Consumer Privacy Act by emailing us at email address: [privacy@cresleigh.com](mailto:privacy@cresleigh.com). We will require authorized agents to provide proof of the consumer’s identity and proof of designation as the authorized agent. We may also require that a consumer verify his or her own identity directly with us before we respond to an authorized agent’s request.

We reserve the right to deny requests in certain circumstances, such as where we have a reasonable belief that the request is fraudulent.

**California Do Not Track Notice:** Because there are not yet common, industry accepted “do not track” standards and systems, our website does not respond to Do Not Track signals. In addition, we may allow third parties to collect personal information from your activity on our website, as described in the “Information Collection and Use” section above and as described in Annex 1 below.

**CONTACT FOR MORE INFORMATION**

For information and questions about the use of your personal information or this California Consumer Privacy Section or your rights under California law, you may contact us at [privacy@cesleigh.com](mailto:privacy@cesleigh.com)

**Changes to This Privacy Policy**

This Policy may be revised from time to time for any reason. If this Policy changes, the revised policy will include a new effective date, and we will notify you of such changes by posting the revised policy on this page. Be sure to check the Policy whenever you submit personal information to us.

## Annex I Collection, Use and Disclosure of Personal Information

Sources of Information	Category	Types of Information we collect	How we use it	Third parties with whom we may share this information
<p>You when you visit our Site (including your online activities on our Site), make an inquiry about any of our community or home (through our Site, in person, or by phone), make a service request on our Site, visit or stay at one of our properties or communities, enter a promotion or competition conducted by us, engage with us on social media, or otherwise interact with us through posting content on our Site, or communicating with us via phone, fax, chat or email.</p>	Personal Identifiers	Name, signature, mailing address, telephone number, email address, date of birth, location, broker name, lot number, best times to reach you, type of service request, description of work requested, permission to enter your home if making a service request.	<p>To keep you informed of our offerings, services and promotions, and to provide you with community information as applicable, through marketing communications, newsletters and other information and materials you have chosen to receive.</p> <p>To contact you directly (via email, text message, postal mail, or telephone) regarding specific properties or other offerings about which you have requested updates.</p>	<p>Consultants, service providers, and contractors that we use to support our business and operations (e.g. vendors hosting or operating our Site including chat providers like Altas, customer management systems like New Star Sales, entities that deliver marketing messages and advertisements, and fraud detection service providers) who have agreed to keep the information confidential and use it only to provide the applicable services;</p>
<p>We may also collect information from third-party sources, such as Zillow, BDX/The New Home Source, third-party service providers, opt-in lists, publicly available data, consumer reporting agencies, other companies and referrals.</p>	Commercial Information	Services considered, purchased, reviewed, or other purchasing or consuming habits such as home preference and purchasing timelines	<p>To process registration requests when you register for our programs or services, or otherwise administer your participation in our programs or services.</p> <p>To provide you with a customized user experience;</p> <p>To send promotional communications or marketing offers (unless you have requested that we not send such communications);</p> <p>To improve our business operations, properties, communities, services, Site, and social media;</p> <p>For marketing, research, legal, and other business purposes;</p> <p>To comply with our policies, procedures, and legal obligations, including complying with law enforcement or</p>	<p>Third party companies we work with who help to gather information from you or help us to communicate with you, entities that assist with data analytics, analyzing Site metrics, advertising and behavioral remarketing, as explained further below;</p> <p>Third parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests;</p> <p>An acquirer or successor-in-interest in the event of a reorganization, merger, sale, change of control, consolidation, joint venture, assignment, transfer or other disposition of all or any part of Cresleigh Homes Corporation or its affiliates including any negotiation thereof; and</p> <p>Third-party sponsors of contests, sweepstakes, discounts, and promotions that you enter into.</p>



<p>Your in-person visit to our properties or communities, including but not limited to our lobby, parking lot, and other general areas.</p>	<p>Biometric Information</p>	<p>Photographs, video, [face, voice, etc]</p>	<p>To maintain and preserve the security and safety of our guests, tenants, home owners, employees, premises, and property;</p> <p>Improve our premises and tenant, homeowner, and visitor experience; and</p> <p>To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies.</p>	<p>Third party service providers such as security services, vendors hosting our data.</p> <p>Third parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests.</p>
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