

California Privacy Notice

1. Background and scope

This Privacy Notice (“Notice”) is issued on behalf of the Willowick (“Willowick”, “We”, “Our”, “Us”) group of entities, including Willowick Management LLC and Willowick Management LP. Willowick is sensitive to the confidentiality of your Personal Information and has created this Notice in order to demonstrate Willowick’s commitment to privacy. This Notice applies to all information you provide to Willowick, or Willowick obtains from you, or about you.

If we change our Notice we will post the changes on this page and may place notices on other pages of the web site, so that you may be aware of the information we collect and how we use it at all times.

2. What Personal Information do we Collect?

Personal information refers to data that could be used, alone or in combination with other data, to identify you as an individual. Personal Information also includes information designated as such under California law. Personal Information does not include publicly available information, or information that is deidentified or aggregated information.

The personal information we collect about you is to facilitate the provision of residential housing on your behalf and associated services.

Willowick may collect the following categories of personal information:

- Identifiers
 - contact information (such as name, alias, postal address, telephone number, email address, zip code);
 - passport details, driver’s license number, social security number;
 - online identifiers (such as IP address, online account name, or other unique online identifier);
 - Other similar identifiers
- Personal information not otherwise described in another category, including, but not limited to, signature, insurance policy number, bank account number, credit card number, debit card number, or any other financial information.
- Characteristics of protected classifications under California or federal law (such as gender or age);
- Commercial Information, including records of services obtained or considered;
- Internet or other electronic network activity (such as browsing history, search history, the device and network you are using to connect, web server logs, and information regarding a consumer’s interaction with an internet website application, or advertisements), as further described in Section 11;
- Geolocation data;
- Audio (such as voice recordings used for quality control and dispute resolution), electronic, and visual information (such as video surveillance);
- Professional or employment-related information (including occupation, job title, department, and name of organization and job history);

- Inferences drawn from other information to create a profile reflecting a consumer's preferences, characteristics, psychological trends, dispositions, behavior, attitudes, intelligence, abilities, and aptitudes; and
- Sensitive information, such as social security, driver's license, state identification card, or passport number

With respect to minors, we may collect the names of minors as occupants of your household if you fill out an application or become a resident. We do not intentionally collect Personal Information from minors without the consent of a parent or guardian. Any Personal Information of minor is protected according to this Notice.

3. How do we collect personal information?

Willowick collects personal information from the following categories of sources:

- You, we collect personal information directly from our interactions with you, for example:
 - When you make inquiries or provide information through our website, in person, or by contacting us directly by telephone or through email. When you complete a residential application. When you submit information through an online form, survey, or other interactive area of our website. When you submit information through our resident accessible portal. When you visit our website, use an application, or open an email including from data analytic providers and other service providers. When you interact with us on social media.
- Service providers that manage and maintain our services, for example:
 - Property management platform providers
 - Data analytics providers for our website and applications
 - Network security providers for our IT environment

Analytics

Some pages on this web site use a technology called "cookies". A cookie is a token that a server gives to your browser when you access a web site. Cookies are capable of storing many types of data. Cookies help provide additional functionality to the web site or help us analyze web site usage more accurately. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to the web site. We use cookies to collect both Personal Information and non-Personal Information. In all cases in which cookies are used, we will not collect personally identifiable information except with your explicit permission. With most Internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. Please refer to your browser instructions or help screen to learn more about these functions.

4. Why do we collect your personal information?

Willowick may use your Personal Information to contact you about the offerings or services in which you have expressed an interest. We collect and use Personal Information for the following purposes:

- providing you with residential services, including processing your residential application, enabling your residential lease, maintaining your residential lease, creating and maintaining a tenant account, processing your payments, subscribing you to our e-newsletter and other residential notification materials;
- developing and improving our residential services, including conducting market research, tenant satisfaction surveys, and requesting feedback on your tenant experience;

- operating, evaluating and improving our business (including developing new products and services; managing our communications; determining the effectiveness of and optimizing our advertising; analyzing our products, services, websites, mobile applications and any other digital assets; facilitating the functionality of our websites, and mobile applications and any other digital assets);
- responding to your enquiries;
- sending marketing and promotional materials related to our products and services, including, physical mailers, electronic marketing and notifications, and telephone calls;
- managing, maintaining, and protecting our digital environment, such as our network environment, our websites, and our applications, including detecting, deterring, protecting against, and investigating fraudulent, unauthorized, unlawful, or illegal activities and enforcing our Terms and Conditions;
- managing, maintaining, and protecting our physical environment, including detecting, deterring, protecting against, and investigating fraudulent, unauthorized or illegal activities;
- protecting the health and safety of tenants, visitors, employees, contractors, and others at any of our facilities;
- complying with and enforcing our legal requirements, including regulatory reporting and compliance, requests from law enforcement, requests of governmental authorities, and valid court orders or from other valid legal process; and
- performing business functions necessary to support and maintain the business of Willowick, including internal accounting and administration.

We also may use the information in other ways for which we provide specific notice at the time of collection

5. Is personal information sold or shared with third parties?

In the preceding 12 months we have not “sold” (as the term “sale” is defined in the CCPA) or “shared” (as the term “share” is defined in the CCPA) Personal Information.

This web site is not directed to children. To our actual knowledge we do not sell or share the Personal Information of consumers under 16 years of age. We do not knowingly collect information from children under the age of 13 on the web site. If you are under the age of 13, please do not provide any Personal Information to us. If we become aware that we have collected Personal Information from a child under the age of 13, we will make commercially reasonable efforts to delete such information from our database.

6. Is personal information disclosed to persons or entities?

Willowick may have disclosed your Personal Information to the persons or entities described in this Section. We do not disclose your Personal Information to persons or entities, except as described in this Notice. Entities to whom we disclose Personal Information in this Section are required to maintain the confidentiality of such Personal Information and are prohibited from using your Personal Information for purposes other than those agreed. As used in this section, “disclose” means transfer, send, or otherwise made available or accessible to another person or entity, but does not include selling or sharing as those terms are defined under the CCPA.

Your Personal Information may be disclosed to the following types of persons or entities:

- Affiliated companies of Willowick;

- Professional advisors, service providers, contractors, and suppliers who perform services to facilitate the business of Willowick or your residential lease with us, such as accountants, auditors, attorneys, tax advisors, financial advisors, insurance brokers, entities assessing our compliance with industry standards, investigation providers, payment processing providers, printing and mailing companies, marketing and advertising suppliers, email delivery providers, on-site property management providers, security vendors, data analytics providers, information technology vendors, platform providers, resident services providers, and other similar services (“Service Providers”);
- Property owners;
- Intermediaries, brokers, real estate agents, renters’ agents, and other individuals and entities that partner with us (“Broker Partners”)
- Transactional parties, in the event of any contemplated or actual re-organization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stocks (“Transactional Parties”);
- Competent authorities, national and/or international regulatory agencies, law enforcement authorities, statutory or public bodies, or judicial body, court or other form of tribunal (“Governmental Authorities”);

In the preceding 12 months we disclosed personal information as follows:

Category of Personal Information	Category of Person or Entity	Purpose of Disclosure
Identifiers	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Personal Information described in Cal. Civ. Code § 1798.80(e) and not described in another category	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Characteristics of protected classifications	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials

	<ul style="list-style-type: none"> ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Commercial Information	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Internet / Electronic Network Activity	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Geolocation Data	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Audio, Electronic, and Visual Information	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials ● Protect digital environment

	<ul style="list-style-type: none"> ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Professional or Employment-Related Information	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Inferences drawn to create a profile	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Send marketing materials ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick
Sensitive Information	<ul style="list-style-type: none"> ● Affiliated Companies of Willowick ● Service Providers ● Property Owners ● Broker Partners ● Transactional Parties ● Governmental Authorities 	<ul style="list-style-type: none"> ● Provide residential services ● Develop residential services ● Protect digital environment ● Protect physical environment ● Protect health and safety of persons ● Comply with Governmental Authorities ● Perform business functions of Willowick

We do not use or disclose your sensitive personal information for purposes other than those allowed under the CCPA, including Section 7027, subsection (m).

7. What are your rights concerning your Personal Information?

Under the CCPA, you have the following rights:

- Right to Know. You have the right to know the Personal Information we have collected about you during the previous 12 months, including the categories of Personal Information and the specific pieces of Personal Information we have collected about you, the categories of sources from which the Personal Information is collected, the purpose for collecting, selling, or sharing personal information, and the categories of third parties to whom we disclose Personal Information.
- Right to Delete. You have the right to delete or have your Personal Information deleted, subject to certain exceptions. If an exception prevents us from deleting your Personal Information, we will inform you at the time you make the request.
- Right to Correct Inaccuracies. You have the right to correct inaccurate Personal Information or request inaccurate Personal Information be corrected.
- Right to No Retaliation. You have the right to exercise the above rights free from retaliation, including we will not deny of goods or services, charge different prices where the difference is not related to the value of the Personal Information, or offer different level of quality of goods or services. Denial of services or change in service level due to exercise of your rights does not constitute retaliation.

To make a request regarding your rights, contact us by telephone at 888.928.6029 or by email at corporate.counsel@hines.com. At any time, our residents may visit their resident portal to manage their personal information.

In order to verify your identity, we request that you provide your name and the address of the Willowick property associated with your name. We may also request a copy of your driver's license if we are unable to verify your information. In addition, we request that you provide an email address in order to contact you regarding your request.

We will respond to your request within the 45-day period required by applicable law. In the event we cannot respond to your request, we will notify you of the reasons for the delay and the extended period for response. If we determine that we cannot respond to your request for any reason, we will notify you of the reasons for taking no action and for any instructions as to how to appeal.

You may use an authorized agent to exercise your rights on your behalf. The authorized agent must provide us with proof of your written permission (for example, a power of attorney) that demonstrates authorization to submit a request on your behalf. An authorized agent must follow the process described above to make a request and must verify the agent's own identity.

Further correspondence regarding questions, comments, or concerns should be made in writing to corporate.counsel@hines.com.

8. How secure is my Personal Information?

We have put in place various security procedures as set out in this Notice. Willowick takes the security and privacy of Personal Information extremely seriously. We have strict internal procedures which cover the storage, access, and disclosure of your information.

We maintain an information security program designed to protect your Personal Information, including reasonable security procedures and practices appropriate to the nature of the Personal Information to protect the Personal Information from unauthorized or illegal access, destruction, use, modification, or disclosure.

9. How long do we keep your Personal Information?

We will hold your personal information on Willowick's systems for as long as is necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory, or internal policy requirements.

10. Do you maintain linked sites?

Our websites may contain links to third party websites over which we have no control. We are not responsible for the privacy practices or the content of such websites. We encourage you to read the privacy policies of any linked third party websites you visit as their privacy policies and practices may differ from ours.

The Site may provide you with links to other web sites. This Privacy Policy does not apply to any information that you may provide to third parties, such as through other sites linked to through the Site. Willowick is not responsible for those sites and cannot control the content of what is offered on those sites, or on links from those sites, or the privacy policy or data security, if any, of those sites.

11. Terms of Use

Please take the time to read our Terms, including the limitations on damages and application of the law of the state of Texas. 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 Willowick.

12. Who do I contact to give feedback, ask questions, or make complaints?

Questions, comments, or concerns related to this Notice or our privacy practices, can be made by contacting us at 888.928.6029 and corporate.counsel@hines.com.

If you wish to exercise any of your Rights, please see Section 7 of this Notice.

13. Changes to our Notice

We reserve the right to amend this Notice from time to time. As required, we will notify you of an updated and amended copy of this Notice. If we change our Notice, we will post the changes on this page and may place notices on other pages of the web site, so that you may be aware of the information we collect and how we use it at all times.

This Privacy Notice was last updated on December 11, 2023.