

## CONSUMER PRIVACY POLICY

Last Updated: May 6, 2026

This privacy policy (“the Privacy Policy”) of MG Properties (“Company”) details the privacy practices regarding information we collect from persons or entities (“you” or “your”) who use our corporate website, the websites of our individual apartment properties, or our related mobile applications that may be available for download (collectively, the “Site”).

This policy further explains the rights of residents or lease applicants, regarding the collection, use, sale, and sharing of their personal information under the applicable consumer privacy and disclosure laws in California, Washington, Oregon, Nevada, Arizona, Colorado, and Texas (as described in more detail below).

**PURPOSE.** The purpose of this Privacy Policy is to inform you about the types of information we gather about you, including without limitation, information gathered when you visit the Site, and information we may receive from third parties or affiliates in addition to that online information, how we may use that information, whether we disclose that information to anyone, and the choices you have regarding our use of, and your ability to correct, the information. We strive to help visitors of the Site protect their privacy while using our Site.

THE SITE IS NOT INTENDED FOR CHILDREN AND COMPANY DOES NOT KNOWINGLY SOLICIT OR COLLECT PERSONAL INFORMATION ON THE SITE FROM CHILDREN UNDER THE AGE OF 13. IF COMPANY LEARNS THAT A CHILD UNDER THE AGE OF 13 HAS SUBMITTED PERSONALLY IDENTIFIABLE INFORMATION TO COMPANY THROUGH THE SITE, IT WILL TAKE REASONABLE MEASURES TO DELETE SUCH INFORMATION FROM ITS RECORDS AND TO NOT USE SUCH INFORMATION FOR ANY PURPOSE (EXCEPT WHERE NECESSARY TO PROTECT THE SAFETY OF THE CHILD OR OTHERS, AS REQUIRED BY LAW, OR AS MAY OTHERWISE BE REQUIRED BY LAW).

### **YOUR CONSENT AND POLICY CHANGES. PLEASE READ THIS ENTIRE PRIVACY POLICY CAREFULLY.**

By using the Site, you consent to the collection, use, and disclosure of personal information as described in this Privacy Policy, subject to any state-specific rights and consents set out below. California, Washington, Oregon, Nevada, Arizona, Colorado, and Texas, provide residents with additional rights and, in some cases, require affirmative opt-in consent for specific categories of data. Your use of the Site does not constitute consent where a state law requires an opt-in. We may update and make changes to this policy, so we encourage you to review it periodically. By using the Site after the effective date of any modification to the Privacy Policy, you expressly consent, without qualification, to the collection, use and disclosure of information, including Personally Identifiable Information (that you previously provided or later provide), as described in the new Privacy Policy.

1. Key Terms. It would be helpful to start by explaining some key terms used in this policy:

We, Us, Our, Company	Gleiberman Properties, Inc.
Our Representative	Director of Marketing – MG Properties, 10505 Sorrento Valley Road Suite 300, San Diego, CA 92121
Personal information	Any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer or household.
Sensitive personal information	Personal information revealing a consumer's social security number, driver's license and passport numbers, account numbers and credentials, geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, and citizenship or immigration status.
Biometric Information	An individual's physiological, biological, or behavioral characteristics, including information pertaining to an individual's deoxyribonucleic acid (DNA), that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

**2. Personal Information We Collect About You.** We collect two types of information: personally identifiable information and non-personally identifiable information. Personally identifiable information is information that identifies you or can be used to identify or contact you (“Personally Identifiable Information”). We also may collect information that by itself typically cannot be used to identify or contact you, such as demographic information (e.g. age, profession or gender), browser types, domain names, internet service providers, referring/exit pages, date/time stamp, operating system, clickstream data, information about

you such as how you use the Site and your communication preferences, and other anonymous statistical data involving the use of our Site (“Non-Personally Identifiable Information”).

Personally Identifiable Information we collect may include, but is not limited to: your name, email addresses, postal addresses, postal codes, user Internet Protocol (IP) addresses, social security/insurance number, driver’s license number, prior addresses, monthly rent paid at prior residences, employers, job titles, income, telephone numbers, credit card information, bank account information and routing numbers, date of birth, gender, age, marital status, user name and password (if you choose to become a registered user of the Site or our products and services), emergency contact information, information about your pets, information about your vehicles including license plate numbers, and other information either desirable or necessary to provide quality services to our customers and visitors. We may also collect information about you such as your use of the Site and communication preferences.

You may choose not to provide your Personally Identifiable Information by not entering it on the Site; however, you will not be able to use certain services and features if those services and features require Personally Identifiable Information in order to function.

In the preceding 12 months, we have collected the following categories of consumer personal information:

<b>Categories of Personal Information</b>
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, license plate number, passport number, or other similar identifiers)
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement)
Geolocation data including locations of mobile devices
Professional or employment-related information
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
Sensitive Personal Information

Biometric Information including facial recognition, for purposes of identity verification, security, and fraud prevention.

3. **Parties With Whom We Share Your Personal Information.** A full list of the parties with whom we share your personal information may be found by scrolling to the bottom of this page.
4. **Limiting Use of Sensitive Personal Information.** Our collection and use of your personal information is explained in further detail below. To learn how to adjust your privacy settings, please visit the home page of this website and use the privacy controls located in the lower-left corner of the page.
5. **How Your Personal Information is Collected.** We collect most of this personal information directly from you—in person, by telephone, text or email, and/or via our website and app. However, we may also collect information from the following categories of sources:
  - Your application to lease an apartment, as well as all forms/documents that you fill out when you lease your apartment with us;
  - Publicly accessible sources (e.g., property records);
  - Third parties, with your consent (e.g. tenant background and credit screening services, and other third parties that assist in screening tenant applications). These third parties are required to sign agreements to use reasonable efforts to protect all consumers' information.
  - Cookies on our website;
  - Automated information collection; and
  - Our IT systems, including:
    - Door and gate entry systems and reception logs;
    - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.
6. **USE OF COOKIES AND OTHER TECHNOLOGIES.** Like many other website operators, Company may use cookies to customize content specific to your interests and track your use of the Site. “Cookies” are small text files that are placed on your computer or other device by websites that you visit, and may be used to store your personal information. Cookies are widely used in order to make websites and other applications work, or work more efficiently, and help them remember certain information and recognize your internet browser. Cookies may last until you close your browser (“session” cookies) or over repeat visits (“persistent” cookies).

We use cookies and similar technologies to:

- Assist you in efficiently and safely navigating and experiencing our services;
- Enable you to register, login, provide feedback and otherwise interact with our services;
- Store and honor your preferences and settings;
- Measure and analyze usage and performance data; and
- Assist us with promotional and marketing efforts (including interest-based advertising).

If you access any of our services subject to a contract between us and you, cookies and similar technologies will be used as necessary for the performance of that contract and for our legitimate business operations related to providing the service.

In addition to cookies, Company may use other now known or later developed technologies, to assist Company in observing the behavior of users visiting the Site. These technologies access individual user information but the information is used only to compile aggregated statistics about the Site's usage.

**Third Party Cookies.** This Site uses Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. ("Google"), to better assist Company in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer's IP address. That information will be transmitted to and stored by Google. The information will be used for the purpose of evaluating consumer use of the Site, compiling reports on Site activity for Company's use, and providing other services relating to Site activity and 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. The use of cookies by Google Analytics is covered by Google's privacy policy: <https://policies.google.com/privacy>.

How to manage cookies and interest-based advertising. You can manage the use of certain types of cookies, including targeting cookies used for personalized advertising, also known as interest-based advertising (IBA), by amending your cookies settings in your browser's privacy preferences menu. You also may be able to block or delete cookies by selecting the appropriate settings on your browser's privacy preferences menu.

You can also opt out of IBA by turning off targeting cookies used for IBA via the consumer choice tools created under self-regulation programs in many countries, such as the US-based [YourAdChoices](#), the Canada-based [AdChoices](#) or the EU-based [Your Online Choices](#). We adhere to the Digital Advertising Alliance Self-Regulatory Principles for Interest-Based Advertising.

Certain content and features in our services depend on cookies to function. For example, authentication cookies are used to identify and recognize registered users and to enable them

to gain access to requested content or features. Please note, if you choose to block all cookies, you will not be able to use the full functionality of the site, as you cannot sign in or use certain content or features. If you choose to delete cookies, any settings and preferences dependent on those cookies will be lost.

7. Why We Use Your Personal Information. We collect, use, and share consumer personal information for the following business purposes:

- Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors that impair existing intended functionality;
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business;
- Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business or service provider;
- Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer;
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business;
- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;
- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for</b>	<b>Our reasons</b>
To provide services to you which you have requested from us, including, without limitation, enabling you to use the Resident Portal	For the performance of our contract with you

To prevent and detect fraud against you or MG Properties	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations

Updating and enhancing customer records	<p>For the performance of our contract with you</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers, including sending you targeted messages, publications, news, and information about events, special offers, promotions and benefits</p>
Statutory returns	<p>To comply with our legal and regulatory obligations</p>
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services and those of selected third parties to:</p> <p>—existing and former customers;</p> <p>—third parties who have previously expressed an interest in our services;</p> <p>—third parties with whom we have had no previous dealings.</p>	<p>For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers, including sending you targeted messages, publications, news, and information about events, special offers, promotions and benefits</p>
Credit reference checks via external credit reference agencies	<p>For our legitimate interests or those of a third party, i.e., to ensure our customers are likely to be able to pay for our products and services</p>
External audits and quality checks, e.g., for accreditations and the audit of our accounts	<p>For our legitimate interests or a those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

- 8. EMAIL MANAGEMENT.** You may receive emails from Company for a variety of reasons. We respect your desire to manage email correspondence. If you have an account with Company on the Site, you can select your preferences through your account settings. You can also manage your receipt of certain types of communication by following the instructions included in the email we send you. Please note that, even if you unsubscribe from certain

email correspondences, we may still need to email you with important transactional or administrative information.

**9. Categories of Personal Information We Shared.** In the preceding 12 months, we have shared the following categories of personal information:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement);
- Geolocation data;
- Professional or employment-related information;
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes; and
- Sensitive personal information.

**10. Categories of Personal Information We Disclosed for a Business Purpose.** In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;

- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement);
- Geolocation data;
- Professional or employment-related information;
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes; and
- Sensitive personal information.

**11. How We Store Your Information.** Company is committed to protecting the security of any personal information you provide to us. We maintain commercially reasonable safeguards to maintain the security and privacy of personal information that you provide to us. In spite of these protections, Company cannot guarantee the security of any data submitted over the Internet. After your information reaches Company, however, it is protected by procedures and technology designed to block reasonably foreseeable intrusions by unauthorized third parties. We may store and process your personal information in the United States or Canada or any other country in which we or our agents maintain facilities. By using the Site, you consent to the transfer of your information among these facilities, including those located outside your home country.

**12. How Long Your Personal Information Will Be Kept.** Because there are numerous types of Personal Information in each category of Personal Information, and various uses for each type of Personal Information, our retention periods for each category of Personal Information vary. We retain specific portions of Personal Information based upon how long we have a legitimate purpose to retain such information.

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know, and request disclosure of:</p> <ul style="list-style-type: none"> <li>• The categories of personal information we have collected about you, including sensitive personal information;</li> <li>• The categories of sources from which the personal information is collected;</li> <li>• Our business or commercial purpose for collecting, selling, or sharing personal information;</li> </ul>
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	<ul style="list-style-type: none"> <li>• The categories of third parties to whom we disclose personal information, if any; and</li> <li>• The specific pieces of personal information we have collected about you.</li> </ul> <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> <li>• Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;</li> <li>• Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or</li> <li>• Provide the personal information to you more than twice in a 12-month period.</li> </ul>
<p>Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose</p>	<p>In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> <li>• The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared; and</li> <li>• The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose.</li> </ul> <p>You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.</p>
<p>Right to Limit Use of Sensitive Personal Information</p>	<p>You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to:</p>

	<ul style="list-style-type: none"> <li>• Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services;</li> <li>• To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the consumer’s personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer’s current interaction with the business, provided that the consumer’s personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer’s experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business; and</li> <li>• As authorized by further regulations.</li> </ul> <p>You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> <li>• Delete your personal information from our records; and</li> <li>• Direct any service providers or contractors to delete your personal information from their records.</li> <li>• Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort.</li> </ul>

	<p>Please note that we may not delete your personal information if it is reasonably necessary to:</p> <ul style="list-style-type: none"> <li>• Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;</li> <li>• Help to ensure security and integrity to the extent the use of the consumer’s personal information is reasonably necessary and proportionate for those purposes;</li> <li>• Debug to identify and repair errors that impair existing intended functionality;</li> <li>• Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;</li> <li>• Comply with the California Electronic Communications Privacy Act;</li> <li>• Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;</li> <li>• Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us</li> <li>• Comply with an existing legal obligation; or</li> <li>• Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.</li> </ul>
<p>Right of Correction</p>	<p>If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.</p>

<p>Protection Against Retaliation</p>	<p>You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA, or any similar privacy laws in Oregon, Washington, Nevada, Arizona, Colorado or Texas. This means we cannot, among other things:</p> <ul style="list-style-type: none"> <li>• Deny goods or services to you;</li> <li>• Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;</li> <li>• Provide a different level or quality of goods or services to you; or</li> <li>• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.</li> </ul> <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.</p>
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**13. California Residents:** Rights under the California Consumer Privacy Act and California Privacy Rights Act include access, deletion, correction, portability, Limit Use of Sensitive Personal Information, and Do Not Sell or Share options. Many or all of these rights also apply in other states discussed below. In addition to California residents, we will follow the same privacy practices with non-California residents as we do in California.

**14. Colorado Residents:** Rights under the Colorado Privacy Act (CPA) include access, correction, deletion, portability, and opt-out of targeted advertising, sale, and profiling that produces legal or similarly significant effects. Colorado residents must be offered opt-in for certain sensitive data processing.

- (a) **Rights and Methods:** Colorado residents may exercise rights to access, correct, delete, portability, and opt out of targeted advertising and profiling that produces legal or similarly significant effects.

- (b) Sensitive Data: We will obtain opt-in consent before processing Sensitive Personal Data categories identified by Colorado law for purposes beyond tenancy performance.
- (c) Vendor Assistance: Our contracts require vendors to assist with Colorado consumer requests.

**15. Oregon Residents:** Rights under the Oregon Consumer Privacy Act (OCPA) include access, correction, deletion, opt-out of targeted advertising and sales, and limits on automated profiling. Oregon residents may request access, correction, deletion, portability, opt-out of sale/sharing, and limit the use of Sensitive Personal Information.

- (a) Profiling and Automated Decision making: We do not use automated profiling that produces legal or similarly significant effects. If we do in the future, Oregon residents will be notified of the logic involved and offered an opt-out.
- (b) Verification and Timelines: We will verify requests using reasonable methods and will respond within the statutorily required timeline; where verification cannot be completed, we will explain next steps and any required identity documents.

**16. Washington Residents:** Washington residents also have opt-out rights for sales/sharing and profiling under the Washington Privacy Act, in addition to the rights listed above for California.

**17. Nevada Residents:** Nevada law provides a right to opt out of the sale of personal information for residents who visit or use our Site, and we will provide residents with the same rights listed above for California.

**18. Arizona Residents:** MG Properties Group remains committed to protecting the personal information of all residents. In accordance with Arizona Revised Statutes § 44-7501, we provide the following disclosure:

- (a) **Data Breach Notification** Pursuant to Arizona Revised Statute 44-7501, if a security breach occurs involving your personal information, we will notify you without unreasonable delay using appropriate methods such as email, mail, or telephonic notice, as required by Arizona law.

**19. Texas Residents: Your Rights Under The Texas Data Privacy and Security Act (TDPSA)** - Under the TDPSA, Texas residents have rights to access, correct, delete, and opt out of targeted advertising and certain profiling; processing of certain sensitive data categories requires opt-in consent.

- (a) Texas residents have the following rights with regard to personal data:
  - (i) Right To Opt Out – you have the right to opt out of targeted advertising, sale of personal data, and profiling in furtherance of decisions that produce legal or similarly significant effects. We do not engage in profiling that produces legal or similarly significant effects. If this changes, Texas residents will be notified and provided opt-out rights.

- (ii) Right to Confirm Access – You may request confirmation regarding processing of your personal data and you may obtain access to that data.
  - (iii) Right to Correct – You may request we correct inaccurate personal data.
  - (iv) Right to Delete – You may request we delete personal data that we have collected.
  - (v) Right to Data Portability – You may request a copy of your personal data in a portable and easily usable format.
  - (vi) You may exercise the above rights by contacting us via the contact information in Section 20 below (“How to Exercise Your Rights”).
- (b) Categories of Personal Data We Process: We process the categories of personal data listed above in Section 2 for Texas residents. The purposes for which we process Texas residents’ personal data is described above in Section 7.
  - (c) Sharing of Personal Data: We share Texas residents’ personal data with the categories of third parties listed below in Section 20.
  - (d) Sensitive Data: We will obtain opt-in consent for processing sensitive data categories where Texas requires such consent (including children’s data) except where processing is necessary to perform a tenancy contract or comply with applicable law. Sensitive data includes: precise geolocation, biometric identifiers, health information, racial or ethnic origin, religious beliefs, sexual orientation, and certain identification or financial numbers. We will obtain opt-in consent for processing biometric data collected by any identity verification service providers (which are utilized for identity verification, security, and fraud prevention).
  - (e) Children’s Data: MG Properties does not knowingly process children’s data. If such processing becomes necessary, we will obtain verifiable parental consent as required by Texas law.
  - (f) Security and Breach: We maintain reasonable administrative, technical, and physical safeguards as required by Texas law and will notify Texas residents and regulators of any data or security breach where sensitive personal information was, or is reasonably believed to have been, acquired by an unauthorized person. In the event of a data or security breach affecting at least 250 Texas residents, we will notify the Texas Attorney General as required under Texas law (pursuant to the procedures set forth in Texas Business & Commerce Code § 521.053).
  - (g) Data Protection Assessments: MG Properties conducts data protection assessments for processing activities required under Texas law, including targeted advertising, sale of personal data, and processing of sensitive personal data.
  - (h) Universal Opt-Out Mechanisms: MG Properties recognizes Universal Opt-Out Mechanisms (UOOMs) as required by Texas law for opting out of targeted advertising and the sale of personal data. This includes (without limitation) browser-based or device-based signals that communicate a consumer’s choice to opt out of targeted advertising or the sale of personal data. When we receive a valid UOOM signal, we will treat that as a request to opt-out for the browser or device.

- (i) Agent to Exercise Rights: Texas residents may authorize an agent to exercise their rights by providing written permission and sufficient verification.
- (j) Our Responsibilities as a Data Controller: When processing personal data of Texas residents, MG Properties will comply with the following controller obligations under the TDPSA:
  - (i) Data Minimization – We collect only what is reasonably necessary for disclosed purposes.
  - (ii) Security Measures – We maintain reasonable technical, administrative, and physical safeguards.
  - (iii) Purpose Limitation – We process data only for purposes that are disclosed and compatible with your expectations.
  - (iv) Non-Discrimination – We do not discriminate against Texas residents for exercising their privacy rights.
  - (v) Processor Contracts – We require service providers to process personal data only as instructed and to maintain appropriate safeguards.
- (k) Definitions Under Texas Law – Under the TDPSA:
  - (i) “Sale” means the exchange of personal data for monetary or other valuable consideration.
  - (ii) “Targeted Advertising” means displaying advertisements based on personal data obtained from a consumer’s activities over time and across non-affiliated websites or applications.
  - (iii) Texas residents have the right to opt out of either or both activities at any time.
- (l) Right to Appeal – If we decline to act on a request that you submit under the TDPSA, you may appeal our decision by e-mailing us at [privacy@mgproperties.com](mailto:privacy@mgproperties.com), or write to us at Attention: Director of Marketing – MG Properties, 10505 Sorrento Valley Road Suite 300, San Diego, CA 92121. You may also call 858-366-6540. We will respond to appeals within 60 days as required by Texas law.

**20. How to Exercise Your Rights.** If you would like to exercise any of your rights as described in this Privacy Policy, you can do so by e-mailing us at [privacy@mgproperties.com](mailto:privacy@mgproperties.com), or write to us at Attention: Director of Marketing – MG Properties, 10505 Sorrento Valley Road Suite 300, San Diego, CA 92121. You may also call 858-366-6540.

If you choose to contact us directly by website/email/phone/in writing, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);
- Proof of your identity and address (e.g., a copy of your driving license or passport or a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

You may also contact us as provided above to revoke or withdraw any previous consents/opt-ins that you have previously provided. We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

**WHO WE SHARE YOUR PERSONAL INFORMATION WITH.** In the preceding 12 months, we have shared consumers' personal information with:

- Our affiliates and corporate partners, including companies within the MG Properties group;
- Service providers we use to help deliver our products and/or services to you, including situations where sharing or disclosing your information is required in order to offer you products or services you may desire;
- A person who in the reasonable judgment of Company is seeking the information as an agent of the individual;
- A third party or parties, where disclosure is required or permitted by law, a judicial proceeding, a criminal investigation, a court order, or legal process;
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers;
- Credit reporting agencies;
- Our insurers and brokers;
- Our banks;
- Identity verification service providers who verify identification documents submitted during the application process; and
- External auditors.
- Other third parties we use to help us run our business, such as marketing agencies or website hosts. These companies include: (1) Apartments.com (advertising); (2) Zillow (advertising); (3) ApartmentList (advertising); (4) Yardi (client relationship management and PMS (property management software)); (5) Elise AI (leasing, tour appointments, etc.); (6) Google Analytics; (7) ApartmentSEO for Google Advertising; (8) Rentable Google My Business Advertising (prospect data); (9) Rentgrata (resident referrals); (10) CORT (furniture rental); (11) Flex (rent data); (12) Zark Parking (parking data); and (13) RentCafe (property management). [ADD NAMES OF ANY IDENTITY VERIFICATION SERVICE PROVIDERS]

We only allow our service providers to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers, contractors, and third parties to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations. Specifically, we may be required to use or disclose your information in connection with a legal action or other proceeding, including without limitation, in response to a court order, a subpoena/summons, or a law enforcement agency's request.

We may also disclose information if, in the reasonable judgment of Company, it is necessary to enforce compliance with our internal policies or the Terms of Use, to prevent illegal activity or suspected fraud, or to protect our Site, customers, or others.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.