

## **WOOD PARTNERS PRIVACY POLICY**

Effective Date: **September 1, 2019**

### **Privacy Policy Scope**

Welcome! This Privacy Policy applies to your use of any Wood Partners' online service (e.g., website, software, or mobile app) that posts a link to this Privacy Policy, regardless of how you access or use it. Wood Partners uses third parties who operate online services branded under our name to facilitate the apartment application process and to operate our residents' portal. Please note that these third party sites that have their own privacy policies and terms of use and they, not we, are responsible for their data practices.

### **Overview**

**We have summarized some (but not all) of the main topics of this Privacy Policy below. The complete provisions, and not the headings or summaries govern.**

- **Your Choices and Your CA and CT Privacy Rights**

You have certain choices regarding information collection and communications options including:

  - California residents have certain privacy rights
  - Connecticut residents have certain privacy rights
  - Your options regarding accessing and changing certain of your Personal Information are available
  - Children's and minors' privacy rights, and notice to parents of these rights
- **Collection of Information**
  - Wood Partners may ask you to provide Personal Information (e.g., name, address, email, etc.), as well as other information which may be required to access certain content, features, and functionality.
  - Wood Partners and third parties may collect information from you automatically as you access the Service (e.g., information about the devices you use).
  - This may include use of cookies and other technologies to keep track of your interactions with the Service.
- **Use of Information**

The information Wood Partners collects is used for a variety of purposes as detailed in this Privacy Policy. For example, your information helps Wood Partners provide and improve the Service, communicate with you, and operate Wood Partners' business.
- **Sharing of Information**
  - Wood Partners may share the information it receives from or about you via the Service (as defined below) (or give others access to it), including your Personal Information, for a variety of purposes, as detailed in this Privacy Policy. These include, without limitation:
    - to deliver and improve Wood Partners' services;
    - for Wood Partners' Companies (defined below) marketing and other purposes; and
    - in connection with corporate transactions (e.g., merger or sale);
  - Wood Partners obtains your consent (e.g., opt-in, opt-out), however, before knowingly sharing Personal Information with third parties (other than Wood Partners Companies) for their own direct marketing purposes.
  - Wood Partners may share your non-Personal Information, aggregate and/or de-identified information about you except as prohibited by applicable law.

## WOOD PARTNERS PRIVACY POLICY

Thank you for visiting an online service (e.g., website or mobile app) that posts a link to this Privacy Policy (“**Service**”) owned or operated by Wood Real Estate Investors, LLC and Wood Residential Services, LLC (“**Wood Partners**” “**we**” “**our**” or “**us**”). This Privacy Policy will provide you with information as to how Wood Partners collects, uses, and shares information about you, including the choices Wood Partners offers with respect to that information, and applies to your use of any Service, regardless of how you access or use it. It does not apply to Wood Partners’ data collection activities offline or otherwise outside of the Service (unless otherwise stated below or at the time of collection). For certain Services, there may be additional notices about information practices and choices. Please read those additional privacy disclosures to understand how they apply to you.

By visiting or otherwise using the Service, you agree to the Service’s **Terms of Use** and consent to Wood Partners’ data collection, use, and disclosure practices, and other activities as described in this Privacy Policy, and any additional privacy statements that may be posted on an applicable part of the Service. If you do not agree and consent, please discontinue use of the Service, and uninstall Service downloads and applications.

### 1. INFORMATION WE COLLECT

#### A. Information about You that You Provide.

Wood Partners, and/or its Service Providers (defined below), may collect information you provide directly to Wood Partners and/or its Service Providers via the Service. For example, Wood Partners collects information when you use or register for the Service, subscribe to notifications, post on the Service, participate in promotional activities, or communicate or transact through the Service. In addition, when you interact with Third-Party Services (defined below), you may be able to provide information to those third parties. For more information on Third-Party Services’ data collection and practices, see Section 6 below. For more information on Service Provider data collection and practices, see Section 3 below.

Information Wood Partners, its Service Providers and/or Third-Party Services may collect may include: (1) personally identifiable information, which is information that identifies you personally, such as your first and last name, e-mail address, phone number, address, full payment account number, social security number, and driver’s license number (“**Personal Information**”); and (2) demographic information, such as your gender, age, zip code, interests, and recent and upcoming purchases (“**Demographic Information**”). Except to the extent required by applicable law, Demographic Information is “**non-Personal Information**” (i.e., data that is not Personal Information under this Privacy Policy). In addition, Personal Information, including, without limitation, Wood Partners-Collected PI (defined below), once “**De-identified**” (i.e., the removal or modification of the personally identifiable elements, or the extraction non-personally identifiable elements including through anonymization, pseudonymization, and/or hashing) is also non-Personal Information and may be used and shared without obligation to you, except as prohibited by applicable law. However, we do not make assurances that De-identified data is not capable of re-identification. To the extent any non-Personal Information is combined by or on behalf of Wood Partners with Personal Information Wood Partners itself collects directly from you on the Service (“**Wood Partners-Collected PI**”), Wood Partners will treat the combined data as Wood Partners-Collected PI under this Privacy Policy.

**EEOC / Affirmative Action Reporting.** In conjunction with laws and regulations enforced by the Equal Employment Opportunity Commission (“**EEOC**”), the Office of Federal Contract Compliance Programs (“**OFCCP**”) and similar state and local regulatory agencies, we may ask you to provide us with self-identifying information (such as veteran status, gender and ethnicity). Providing such self-identifying information is voluntary, but if you do provide us with such information, we may submit that information, to the EEOC, the OFCCP and similar state and local regulatory agencies or otherwise use or disclose it for business-related purposes, including, without limitation, responding to information requests, fulfilling regulatory reporting requirements and defending against employment related complaints.

**B. Information Collected Automatically.** Wood Partners, its Service Providers, and/or Third-Party Services may also automatically collect certain information about you when you access or use the

Service (“**Usage Information**”). Usage Information may include IP address, device identifier, browser type, operating system, information about your use of the Service, and data regarding network connected hardware (e.g., computer or mobile device). Except to the extent required by applicable law, or to the extent Usage Information is combined by or on behalf of Wood Partners with Wood Partners-Collected PI, Wood Partners does not consider Usage Information (including, without limitation, unique device identifiers) to be Personal Information or Wood Partners-Collected PI. For more information on Third-Party Services’ data collection and practices, see Section 6 below. For more information on Service Provider data collection and practices, see Section 3 below. For information on choices some of these third parties may offer you regarding automated data collection, see Section 11 below.

The methods that may be used on the Service to collect Usage Information include:

- **Log Information:** Log information is data about your use of the Service, such as IP address, browser type, Internet service provider, referring/exit pages, operating system, date/time stamps, and related data, and may be stored in log files.
- **Information Collected by Cookies and Other Tracking Technologies:** Cookies, web beacons (also known as “tracking pixels”), embedded scripts, location-identifying technologies, and other tracking technologies now and hereafter developed (“Tracking Technologies”) may be used to collect information about interactions with the Service or e-mails, including information about your browsing and purchasing behavior.
- **Cookies**

A cookie is a small text file that is stored on a user’s device, which may be session ID cookies or tracking cookies. Session cookies make it easier for you to navigate the Service and expire when you close your browser. Tracking cookies remain longer and help in understanding how you use the Service, and enhance your user experience. Cookies may remain on your hard drive for an extended period of time. If you use your browser’s method of blocking or removing cookies, some but not all types of cookies may be deleted and/or blocked and as a result some features and functionalities of the Service may not work. A Flash cookie (or locally shared object) is a data file which may be placed on a device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your device. HTML5 cookies can be programmed through HTML5 local storage. Flash cookies and HTML5 cookies are locally stored on your device other than in the browser and browser settings won’t control them. .
- **Web Beacons (“Tracking Pixels”)**

Web beacons are small graphic images, also known as “Internet tags” or “clear gifs,” embedded in web pages and e-mail messages. Web beacons may be used, without limitation, to count the number of visitors to the Service, to monitor how users navigate the Service, and to count content views.
- **Embedded Scripts**

An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from Wood Partners’ web server, or from a third party with which Wood Partners works, and is active only while you are connected to the Service, and deleted or deactivated thereafter.
- **Location-identifying Technologies**

GPS (global positioning systems) software, geo-filtering and other location-aware technologies locate (sometimes precisely) you, or make assumptions about your location, for purposes such as verifying your location and delivering or restricting content based on your location. If you have enabled GPS or use other location-based features on the Service, your device location may

be tracked. Our property finder feature may access and use information about your device location (such as based on IP address), or your account information, to suggest appropriate apartment options. Our Service content may be personalized based on various information we may have about you to try to provide you with more location-relevant content.

Some information about your use of the Service and certain third-party services may be collected using Tracking Technologies across time and services, and used by Wood Partners and third parties for purposes such as to associate different devices you use, and deliver relevant ads and/or other content to you on the Service and certain third-party services. See Section 11 below regarding certain choices regarding these activities.

Wood Partners is giving you notice of the Tracking Technologies and your choices regarding them explained in Section 11 so that your consent to encountering them is meaningfully informed.

**C. Information Wood Partners Collects From Other Sources.** Wood Partners may also obtain information about you from other sources, including Service Providers and Third-Party Services, and combine that with Wood Partners-Collected PI. Notwithstanding anything to the contrary, except to the extent such data combined by or on behalf of Wood Partners with Wood Partners-Collected PI, this Privacy Policy is not intended to limit Wood Partners' activities regarding such third-party-sourced, or non-Service-sourced, information (including Personal Information), and such data will only be treated as Wood Partners-collected PI to the extent it is combined with Wood Partners-collected PI. Wood Partners is not responsible or liable for the accuracy of the information provided by third parties or for third party policies or practices.

## **2. HOW WE USE THE INFORMATION WE OBTAIN.**

Wood Partners may use information about you, including Wood Partners-Collected PI and other Personal Information, for any purposes not inconsistent with Wood Partners' statements under this Privacy Policy, or otherwise made by us in writing at the point of collection, and not prohibited by applicable law, including, without limitation, the following:

- Allow you to participate in the features we offer on the Service;
- Facilitate, manage, personalize, and improve your online experience;
- Process your registration, manage your account and/or upload your User Generated Content (“UGC”). (For more information on how UGC is treated under the Service, see the Terms of Use. For more on the public nature of UGC, see Section 5 below;
- Transact with you, provide services or information you request, respond to your comments, questions and requests, serve you content and/or advertising, and send you notices;
- Wood Partners Companies' marketing and other purposes;
- Improve the Service and for any other internal business purposes;
- Tailor our content, advertisements, and offers;
- Fulfill other purposes disclosed at the time you provide Personal Information or otherwise where we are legally permitted or are required to do so;
- Determine your location and manage digital content rights (e.g., territory restrictions); and
- Prevent and address fraud, breach of policies or terms, and threats or harm.

## **3. INFORMATION WE SHARE WITH THIRD PARTIES.**

Wood Partners may share non-Personal Information, and Personal Information that is not deemed Wood Partners-Collected PI hereunder (provided that Wood Partners is aware of no restrictions of Wood Partners' use, if any), with third parties or other Wood Partners companies, including entities that own and/or manage specific apartment communities (the "**Wood Partners Companies**") for any purpose. Without limiting the generality of the foregoing, we and third parties may convert your Personal Information, including Wood Partners-Collected PI, to non-Personal Information, including without limitation through hashing it or substituting a unique identifier for the Personal Information and we and third parties may use and share that data as permitted by applicable law, including to match data attributes to and from other sources. Any such third party activities are subject to their privacy policies and practices. Wood Partners' sharing of Wood Partners-Collected PI is, however, subject to the following:

- Marketing: Subject to your communications choices explained in Section 11.C below, and the rights of California residents explained in Section 12, we may use your Personal Information to send you marketing communications. Wood Partners will not share your Wood Partners-Collected PI with third parties other than Wood Partners Companies, for their own direct marketing purposes, except in connection with Corporate Transactions (defined below) absent your consent (which may be by means of third party interaction described in the next bullet point).
- Your Disclosure or Consent: As more fully described in Section 5 below (Information You Disclose Publicly or to Others) and Section 6 (Third-Party Content, Third-Party Services, Social Features, Advertising and Analytics), your activities on the Service may, by their nature, result in the sharing of your Wood Partners-collected Personal Information (as well as your other Personal Information and your non-Personal Information) with third parties and by engaging in these activities you consent to that and further sharing and disclosure to third parties. Such third party data receipt and collection is subject to the privacy and business practices of that third party, not Wood Partners.

Wood Partners may also share any information about you (including, without limitation, Wood Partners-Collected PI) for any purposes not inconsistent with this Privacy Policy, or our written statements at the point of collection, and otherwise not prohibited by applicable law, including, without limitation:

- Wood Partners' agents, vendors, consultants, and other service providers (collectively "**Service Providers**") may receive, or be given access to, your information, including, without limitation, Personal Information, Demographic Information, and Usage Information, in connection with their work on Wood Partners' behalf, provided however, Wood Partners does not authorize its Service Providers to use Wood Partners-Collected PI provided by Wood Partners to the Service Providers to send you direct marketing messages other than related to Wood Partners and Wood Partners Companies absent your consent. For more information on choices Service Providers may offer you, see Section 11 below.
- To comply with the law, law enforcement or other legal process, and, where permitted, in response to a government request; and
- If Wood Partners believes your actions are inconsistent with Wood Partners' terms of use, user agreements, applicable terms or policies, or to protect the rights, property, life, health, security and safety of Wood Partners, the Service or its users, or any third party.

In addition, Wood Partners may share your Wood Partners-Collected Personal Information (as well as your other Personal Information and your non-Personal Information), in connection with or during negotiations of any proposed or actual financing of our business, or merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of Wood Partners assets, or transfer of all or a portion of Wood Partners' business to another company, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding ("**Corporate Transactions**").

#### 4. **SWEEPSTAKES, CONTESTS, AND PROMOTIONS.**

Wood Partners may offer sweepstakes, contests, and other promotions (each, a **“Promotion”**), including Promotions jointly sponsored or offered by third parties, which may require submitting Personal Information. If you voluntarily choose to enter a Promotion, your information, including Personal Information, may be disclosed to Wood Partners, co-sponsors, Service Providers, and other third parties, including for administrative purposes and as required by law (e.g., on a winners list). By entering, you are agreeing to the official rules that govern that Promotion, which may include consent to additional or differing data practices from those contained in this Privacy Policy. Please review those rules carefully.

## **5. INFORMATION YOU DISCLOSE PUBLICLY OR TO OTHERS.**

The Service may permit you to post or submit UGC including, without limitation, written content, user profiles, audio or visual recordings, computer graphics, pictures, data, or other content, including Personal Information. If you choose to submit UGC to any public area of the Service, your UGC will be considered “public” and will be accessible by anyone, including Wood Partners. Notwithstanding anything to the contrary, unless otherwise explicitly agreed by us, Personal Information included in UGC is not subject to Wood Partners’ usage or sharing limitations, or other obligations, regarding Wood Partners-Collected PI or other Personal Information under this Privacy Policy or otherwise, and may be used and shared by Wood Partners and third parties to the fullest extent not prohibited by applicable law. Wood Partners encourages you to exercise caution when making decisions about what you disclose in such public areas. For more information on how UGC is treated under the Service, see the Terms of Use. California minors should see Section 9 regarding potential removal of certain UGC they have posted on the Service.

Additionally, the Service may offer you the option to send a communication to a friend or other contact. If so, Wood Partners relies on you to only send to people that have given you permission to do so. The recipient’s Personal Information you provide (e.g., name, e-mail address) will be used to facilitate the communication, but not used by Wood Partners for any other marketing purpose unless Wood Partners obtains consent from that person. Your contact information and message may be included in the communication.

## **6. THIRD-PARTY CONTENT, THIRD-PARTY SERVICES, SOCIAL FEATURES, ADVERTISING AND ANALYTICS.**

The Service may include hyperlinks to, or include on or in connection with, the Service (e.g., apps and plug-ins), websites, locations, platforms, applications or services operated by third parties (**“Third-Party Service(s)”**). Some of these Third-Party Services may license our name and marks and provide services to our residents and prospective residents. When this occurs, they post their own terms and privacy policy. They, not Wood Partners, are responsible for such locations’ data practices and privacy policies and you should review their privacy policies and terms of use before using those services. Examples include On-Site for submitting applications (see [www.on-site.com](http://www.on-site.com)), Yardi/Rent Café for residence services management (see [www.rentcafe.com](http://www.rentcafe.com)), and Real Page ActiveBuilding also for resident services management (see <https://www.realpage.com/resident-portal/>). These Third-Party Services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Information from you.

Certain functionalities on the Service permit interactions that you initiate between the Service and certain Third-Party Services, such as third party social networks (**“Social Features”**). Examples of Social Features include: enabling you to send content such as contacts and photos between the Service and a Third-Party Service; “liking” or “sharing” Wood Partners’ content; logging in to the Service using your Third-Party Service account (e.g., using Facebook Connect to sign-in to the Service); and to otherwise connect the Service to a Third-Party Service (e.g., to pull or push information to or from the Service). If you use Social Features, and potentially other Third-Party Services, information you post or provide access to may be publicly displayed on the Service (See Section 5) or by the Third-Party Service that you use. Similarly, if you post information on a third-party service that references the Service (e.g., by using a hashtag associated with Wood Partners or other Wood Partners Companies in a tweet or status update), your post may be used on or in connection with the Service or otherwise by Wood Partners and Wood Partners Companies. Also, both Wood Partners and the third party may have access to certain information about you and your use of the Service and any Third-Party Service.

Wood Partners may engage and work with Service Providers and other third parties to serve advertisements on the Service and/or on third-party services. Some of these ads may be tailored to your interest based on your browsing of the Service and elsewhere on the Internet, sometimes referred to as “interest-based advertising” and “online behavioral advertising” (“**Interest-based Advertising**”), which may include sending you an ad on a third-party service after you have left the Service (i.e., “retargeting”).

Wood Partners may use Google Analytics, Adobe Analytics or other Service Providers for analytics services. These analytics services may use cookies and other Tracking Technologies to help Wood Partners analyze Service users and how they use the Service. Information generated by these services (e.g., your IP address and other Usage Information) may be transmitted to and stored by these Service Providers on servers in the U.S. (or elsewhere) and these Service Providers may use this information for purposes such as evaluating your use of the Service, compiling statistic reports on the Service’s activity, and providing other services relating to Service activity and other Internet usage.

Except to the extent we combine information we receive from Service Providers, Third-Party Services, or other third parties with Wood Partners-Collected PI, in which case Wood Partners will treat the combined information as Wood Partners-Collected PI under this Privacy Policy, data obtained by Wood Partners from a third party, even in association with the Service, is not subject to Wood Partners’ limitations regarding Wood Partners-Collected PI under this Privacy Policy, however such data remains subject to any restrictions imposed on Wood Partners by the third party, if any. Otherwise, the information collected, stored, and shared by third parties remains subject to their privacy policies and practices, including whether they continue to share information with Wood Partners, the types of information shared, and your choices on what is visible to others on Third-Party Services.

Wood Partners is not responsible for, and makes no representations regarding, the policies or business practices of any third parties, including, without limitation, analytics Service Providers and Third-Party Services associated with the Service, and encourages you to familiarize yourself with and consult their privacy policies and terms of use. See Section 11 for more on certain choices offered by some third parties regarding their data collection and use, including regarding Interest-based Advertising and analytics.

## **7. DATA SECURITY AND MONITORING.**

Wood Partners takes reasonable measures to protect Wood Partners-Collected PI (excluding public UGC) from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the Internet and online digital storage are not completely secure and Wood Partners does not guarantee the security of your information collected through the Service.

To help protect you and others, Wood Partners and its Service Providers may (but make no commitment to) monitor use of the Service, and may collect and use related information including Wood Partners-Collected PI and other Personal Information for all purposes not prohibited by applicable law or inconsistent with this Privacy Policy, including, without limitation, to identify fraudulent activities and transactions; prevent abuse of, and investigate and/or seek prosecution for, any potential threats to or misuse of the Service; ensure compliance with the Terms of Use and this Privacy Policy; investigate violations of or enforce these documents; and otherwise to protect the rights and property of Wood Partners Companies, third parties, and other users. Monitoring may result in the collection, recording, and analysis of online activity or communications through our Service. If you do not consent to these conditions, you must discontinue your use of the Service.

## **8. INTERNATIONAL TRANSFER.**

Wood Partners is based in the U.S. and the information Wood Partners and its Service Providers collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Policy.

## 9. CHILDREN’S PRIVACY.

The Service is intended for a general audience of 18 years of age or older. It is not directed to anyone less than 18 years of age.

Wood Partners does not intend to collect personal information as defined by the U.S. Children’s Online Privacy Protection Act (“COPPA”) (“**Children’s Personal Information**”) in a manner that is not permitted by COPPA. If we obtain knowledge that we have collected Children’s Personal Information in a manner not permitted by COPPA, we will remove such data to the extent required by COPPA.

Any California residents under the age of eighteen (18) who have registered to use the Service, and who posted content or information on the Service, can request removal by contacting Wood Partners at [privacypolicy@woodpartners.com](mailto:privacypolicy@woodpartners.com), detailing where the content or information is posted and attesting that you posted it. Wood Partners will then make reasonable good faith efforts to remove the post from prospective public view or anonymize it so the minor cannot be individually identified to the extent required by applicable law. This removal process cannot ensure complete or comprehensive removal. For instance, third-parties may have republished or archived content by search engines and others that Wood Partners does not control.

## 10. ACCESSING AND CHANGING INFORMATION.

Wood Partners may provide web pages or other mechanisms allowing you to delete, correct, or update some of the Wood Partners-Collected PI, and potentially certain other information about you. Wood Partners will make good faith efforts to make requested changes in Wood Partners’ then-active data repositories as soon as practicable, but it is not always possible to completely change, remove or delete all of your information or public postings from Wood Partners’ repositories (California minors see Section 9) and residual and/or cached data may remain archived thereafter. Further, we reserve the right to retain data (a) as required by applicable law; and (b) for so long as reasonably necessary to fulfill the purposes for which the data is retained except to the extent prohibited by applicable law.

## 11. CHOICES: TRACKING AND COMMUNICATIONS OPTIONS.

**A. Tracking Technologies Generally.** Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies, or other Tracking Technologies. For information on disabling Flash cookies, visit Adobe’s website. Please be aware that if you disable or remove these technologies, some parts of the Service may not work and that when you revisit the Service your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no consensus among industry participants as to what “Do Not Track” means in this context. Like many online services, Wood Partners currently does not alter Wood Partners’ practices when Wood Partners receives a “Do Not Track” signal from a visitor’s browser. Some third parties, however, may offer you choices regarding their Tracking Technologies. Wood Partners is not responsible for the completeness or accuracy of this tool or third party choice notices or mechanisms. For specific information on some of the choice options offered by third party analytics and advertising providers, see the next section.

**B. Analytics and Advertising Tracking Technologies.** You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on. You may exercise choices regarding the use of cookies from Adobe Analytics by going to <http://www.adobe.com/privacy/opt-out.html> under the

section labeled “Tell our customers not to measure your use of their web sites or tailor their online ads for you.”

You may choose whether to receive some Interest-based Advertising by submitting opt-outs. Some of the advertisers and Service Providers that perform advertising-related services for us and third parties may participate in the Digital Advertising Alliance’s (“DAA”) Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, visit <http://www.aboutads.info/choices/>. Some of these companies may also be members of the Network Advertising Initiative (“NAI”). To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use a different device or web browser or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective. Wood Partners supports the ad industry’s [2009 Self-regulatory Principles for Online Behavioral Advertising \(https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf\)](https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf) and expects that ad networks Wood Partners directly engages to serve you Interest-based Advertising will do so as well, though Wood Partners cannot guaranty their compliance. Wood Partners is not responsible for effectiveness of, or compliance with, any third-parties’ opt-out options or programs or the accuracy of their statements regarding their programs.

In addition, we may serve ads on third-party services that are targeted to reach people on those services that are also identified on one of more of our data bases (“**Matched List Ads**”). This is done by using Tracking Technologies or by matching common factors between our data bases and the data bases of the third-party services. For instance, we may use such ad services offered by Facebook or Twitter and other Third-Party Services. We are not responsible for these Third-Party Services, including without limitation their security of the data. If we use Facebook to serve Matched List Ads on Facebook services, you should be able to hover over the box in the right corner of such a Facebook ad, or go to your account settings, and find out what options Facebook offers you to control such ads. If we use Twitter Matched List Ads, you should be able to review your ad options in account settings on Twitter. We are not responsible for such third parties’ failure to comply with your or our opt-out instructions, they may not give us notice of opt-outs to our ads that you give to them, and they may change their options without notice to us or you.

C. **Communications.** You can opt out of receiving certain promotional communications (emails or text messaging) from Wood Partners at any time by (i) for promotional e-mails, following the instructions provided in emails to click on the unsubscribe link, or if available by changing your communication preferences by logging onto your account and (ii) for text messages, following the instructions provided in text messages from Wood Partners to text the word, “STOP.” Please note that your opt-out is limited to the e-mail address or phone number used and will not affect subsequent subscriptions. If you opt-out of only certain communications, other subscription communications may continue. Even if you opt out of receiving promotional communications, Wood Partners may, subject to applicable law, continue to send you non-promotional communications, such as those about your account, transactions, servicing, or Wood Partners’ ongoing business relations.

## 12. YOUR CALIFORNIA AND CONNECTICUT PRIVACY RIGHTS.

### A. Your California Privacy Rights

Wood Partners provides California residents with the option to opt-in or opt-out to sharing of “personal information” as defined by California’s “Shine the Light” law with third parties, other than Wood Partners Companies, for such third parties own direct marketing purposes. California residents may exercise that opt-out, and/or request information about Wood Partners’ compliance with the Shine the Light law, and obtain disclosure of third parties Wood Partners has shared information in accordance with the law for their direct marketing purposes absent your choice and the categories of information shared, by contacting Wood Partners at [privacypolicy@woodpartners.com](mailto:privacypolicy@woodpartners.com) or by sending a letter to 3715 Northside Parkway Suite 4-600, Atlanta,

Georgia 30327 (Attention: Legal Department). Requests must include “California Privacy Rights Request” in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that Wood Partners is only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

California minors should see “Children’s Privacy” regarding removal of certain content they have posted.

**B. Your Connecticut Privacy Rights.**

Connecticut law requires any person or entity that collects Social Security numbers from Connecticut residents in the course of business to create a privacy protection policy and to publish or display it publicly. It is our policy to protect the confidentiality of Social Security numbers in our possession from misuse and improper disclosure by maintaining and enforcing policies and physical and electronic safeguards against misuse and improper disclosure. Unlawful disclosure of Social Security numbers is prohibited, and access to them is limited to personnel who need access to such information in order to perform their job functions.

**13. CHANGES TO THIS PRIVACY POLICY.**

We reserve the right to change this Privacy Policy prospectively effective upon the posting of the revised Privacy Policy and your use of our Service indicates your consent to the privacy policy posted at the time of use. However, we will not treat your previously collected Wood Partners-Collected PI, to the extent it is not collected under the new privacy policy, in a manner materially different than represented at the time it was collected without your consent. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

**14. CONTACT WOOD PARTNERS.**

If you have any questions about this Privacy Policy, please contact Wood Partners at [privacypolicy@woodpartners.com](mailto:privacypolicy@woodpartners.com) or at 3715 Northside Parkway Suite 4-600, Atlanta, Georgia 30327 (Attention: Legal Department).

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