

Apartment Association, California Southern Cities Privacy Statement

Effective July 14, 2022

I. Introduction

This Privacy Statement (“Statement”) explains our privacy practices and provides information on how the Apartment Association, California Southern Cities (“AACSC”, “we,” or “us”) collects, uses, and discloses such information. This Statement applies to any Apartment Association, California Southern Cities website, application, product, software, or service (collectively, our “Services”) that we operate and in which we post a direct link to this privacy policy.

This Privacy Policy addresses two kinds of information: (1) Personal Information; and (2) Anonymous Information. The AACSC is committed to the responsible handling and protection of the data it collects and receives, including personal information. Generally, Personal information (“PI”) is any information that can be used directly or indirectly to identify, contact, or locate someone. Any personal information you provide to us including and similar to your name, address, telephone number and email address will not be released, sold, or rented to any entities or individuals outside of our organization, except as noted below. We take great care to minimize the data we collect on our users, as their privacy is our priority.

II. We Disclose Information to

AACSC discloses personal and anonymous information as follows:

- a. AACSC securely discloses transaction information to a third-party payment provider for the purpose of processing credit card payments and for fraud prevention purposes. Our service providers are required by contract to protect the confidentiality of the personal information we share with them and to use it only to provide specific services on our behalf.
- b. AACSC collects limited anonymous info in order to improve or expand our website content and better tailor it to our users’ needs.
- c. We may disclose the personal information we collect through this Site, when we, in good faith, believe disclosure is appropriate to comply with the law (or a court order or subpoena); to prevent or investigate a possible crime, such as fraud or identity theft; to enforce our Terms and Conditions or other agreements that govern your use of this Site; or to protect the rights, property or safety of our company, our users, or others.
- d. Your personal information may be transferred to another entity (either an affiliated entity or an unrelated third party) in connection with a merger, reorganization, dissolution or similar corporate event. If such a transfer were ever to occur, the acquiring entity’s use of your personal information will still be subject to this Privacy Policy.

- e. We are not responsible for the content of external internet sites. You are advised to read the privacy policy of external sites before disclosing any personal information.
- f. A "cookie" is a small data text file that is placed in your browser and allows us to recognize you each time you visit this site (personalization, etc). Cookies themselves do not contain any personal information, and we do not use cookies to collect personal information. Cookies may also be used by third party content providers such as newsfeeds.
- g. We may share a limited amount of anonymous information with companies who partner with us at expositions. The information is shared only after opt-in and is restricted to communication regarding the exposition.

III. Updates to the Privacy Statement

AACSC reserves the right, at its sole discretion, to change or modify or to add or remove portions of the Privacy Policy at any time ("Updates"). You will be deemed to have accepted any Update by continuing to use our online services and accessing our AACSC website.

IV. This Privacy Statement applies to

This Statement applies to individuals eighteen (18) years or older who use AACSC's website, or any application, product, software or service that we operate and in which we post a direct link to this privacy statement. No parts of our services are directed, designed, marketed, or advertised to attract anyone under the age of eighteen (18). AACSC does not knowingly collect personal information from anyone under the age of eighteen (18).

V. How We Collect Data

We collect personal information (PI) about you from your interactions with us, and from your employer if providing access to our Services (such data would be limited to the identity of your employer and your job title). We obtain personal information from you through:

- your interactions with us and our Services such as, when you purchase or use our Services, register for an event, request information or call us for support;
- your system/device and use of our Services, such as our servers, automatically collect certain information to help us administer, protect and improve users' experience. The information collected includes:
 - ✓ IP address and browser type;
 - ✓ Device information including Unique Device Identifier (UDID), MAC address;
 - ✓ Device operating system and other technical facts;

- ✓ The city, state, and country from which you access our website;
- ✓ AACSC website pages visited and content viewed, stored, and purchased;
- ✓ Information or text entered;
- ✓ Links and buttons clicked;
- ✓ cookies and similar technologies included on our Services file that is placed on a computer or other device and is used to identify the user or device and to collect information.

We use cookies and other similar technologies such as:

- ✓ Flash cookies: Flash cookies (also known as local shared objects) are designed to support browser content supported by Adobe® Flash. They are usually used to enable ads and video content on websites. Like other cookies, they will store information on your device, some of which will be specific to the Flash-enabled content. Flash cookies can only be deleted within Adobe Flash rather than via your browser.
- ✓ Web beacons: Our web pages may contain electronic images known as web beacons (also called single-pixel gifs and transparent graphic images) that we use to help deliver cookies on our sites, count users who have visited those sites, deliver Services, and analyze the effectiveness of our promotional campaigns, for example. We may also include web beacons in our marketing email messages or newsletters to determine whether an email is opened or if links are clicked.

We also collect personal information about you from third parties and service providers such as:

- ✓ the person(s) arranging for you to access our Services (e.g., your employer or our subscriber) in order to set up a user account;
- ✓ an organization to which you belong where that organization provides you access to our Services (such as a library providing you access to certain of our Services, like our legal information products);
- ✓ partners and service providers who work with us in relation to your Service.

VI. Privacy notice for California Residents

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit the [CCPA Privacy Policy](#).

VII. Your Rights Under California Law

The California Consumer Privacy Act of 2018 provides California residents specific rights regarding their personal information. Any terms defined in the CPA have the same meaning when used in this notice.

a. Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable request, we will disclose to you:

- Categories of personal information we collected about you;
- Categories of sources of personal information we collected about you;
- Business or commercial purposes for collecting and selling your personal information;
- Categories of third parties with whom we share your personal information;
- Specific pieces of personal information we collected about you (data portability request);
- If we sold or disclosed your personal information for a business purpose, two (2) separate lists disclosing:
 - ✓ Sales, identifying the personal information categories that each category of recipient purchased; and
 - ✓ Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained

b. Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from your records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.

- Exercise your free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code §1546 seq.).
- 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 the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

c. Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- calling 562.426.8341 or
- emailing info@aacsc.org

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information. Additionally, you may make a verifiable consumer request on behalf of your minor child. You may only make two (2) verifiable consumer requests for access or data portability within a twelve (12) month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative and
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information is yours.

Making a verifiable consumer request does not require you to create an account with us and we will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

d. Response Timing and Format

We strive to respond to a verifiable consumer request within 45 days of receipt. If we require more time, we will inform you of the reason and extension period (up to 90 days) in

writing. If we have an email for you when submitting a verifiable consumer request, we will deliver our responses by email, otherwise it will be through mail.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hinderance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

e. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits or imposing penalties;
- Provide you a different level or quality of goods or services;
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

f. California Do Not Track (DNT) Disclosure

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. The CAA website does not track its visitors over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. For more information on "Do Not Track," visit <http://www.allaboutdnt.com>.

VIII. Additional Terms for International Visitors

We are based in the U.S, and the information we and our service providers collect is governed by U.S. law. If you are accessing the Sites from outside of the U.S., please be aware that information collected through the Sites 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 Sites 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 Statement.

IX. Additional Terms for EU Visitors

The following applies to individuals protected by the European Union's General Data Protection Regulation ("GDPR") who accesses our Services or otherwise provides us with personal information. The data collector for this website is CAA. We process your personal information on several different legal bases, as follows:

- **Contract Performance:** Where we have a contract with you, we will process your personal information in order to fulfil that contract (i.e. to provide you with Services).
- **Consent:** If we are required to obtain your consent to process your personal information, we may perform such processing on the basis of your consent. In such cases, you may withdraw your consent at any time without affecting the lawfulness of prior processing. Providing your consent is voluntary, but we may not be able to provide you with a service for which we require your consent until we obtain it.
- **Legal Obligation:** We may process your personal information as necessary to comply with relevant laws, regulatory requirements, and to respond to lawful requests, court orders, and legal process.
- **Legitimate Interest:** We may process your personal information as necessary to pursue our legitimate interests, for example to fulfill any requests you may make in connection with your submission of personal information, to monitor and improve the quality of the website, and
- To protect and defend our rights, property or safety or that of our other users of the website.

X. Data Subject Rights

Under the GDPR, you may have the following rights:

- The right to obtain from us confirmation as to whether your personal data is being processed, and, where that is the case, to request access to the personal data;
- The right to have personal data rectified if it is inaccurate or incomplete;
- Subject to limitations as provided for in the GDPR, the right to ask us to erase your personal data;
- Subject to limitations as provided for in the GDPR, the right to request restriction of processing of your personal data;
- The right to obtain your personal data in a structured, commonly used, and machine-readable form which you have provided to us, and to reuse it for your own purposes across different services;
- The right to object to processing based on legitimate interests or direct marketing.
- To exercise your rights, please contact us at the information given in Section VIII below.

XI. Security

AACSC is committed to ensuring that any information that is collected remains secure. In order to prevent unauthorized access or disclosure, AACSC has put in place procedures to safeguard and secure the information collected online. AACSC uses industry standard SSL (secure socket layer) encryption to transfer private personal information. Any information stored in our databases is not publicly accessible and exists only on our internal network.

While we do our best to protect your personal information, we cannot guarantee the security of any information that you transmit to us and you are solely responsible for maintaining the secrecy of any passwords or other account information. In addition, other Internet sites or services that may be accessible through our site have separate data and privacy practices independent of us, and therefore we disclaim any responsibility or liability for their policies or actions. Please contact those vendors and others directly if you have any questions about their privacy policies.

XII. Postings to Our Website

This site is provided as a service for the members of the Apartment Association, California Southern Cities.

AACSC reserves the right to evaluate and remove comments that are defamatory, abusive, profane, threatening, vulgar, offensive or illegal in nature.

AACSC reserves the right to terminate access to any user who does not abide by these guidelines and our Code of Ethics.

XIII. How to Contact Us

If you have questions or concerns about this notice, our privacy practices, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us at:

Apartment Association, California Southern Cities

333 W. Broadway, Suite 101

Long Beach, CA 90802-4438

562.426.8341

info@aacsc.org