

DORAN COMPANIES PRIVACY NOTICE

Last Updated On April 29, 2019

At Doran Companies, we value the privacy of our users.

This revised Privacy Notice, effective April 29, 2019, applies only to the practices of the websites owned and operated by a Doran entity such as Doran Companies, LLC, Doran Management, LLC, and our affiliated Doran-owned/managed properties (collectively, "we," "us," "our," or the "Doran Companies").

Accordingly, this Privacy Notice aims to clarify how we collect, maintain, and use your personal information on www.dorancompanies.com, www.doranresidential.com, and the individual websites of our affiliated Doran-owned/managed properties (collectively, the "Sites"). This Privacy Notice explains our online information practices and your choices about how we collect and use your information on the Sites. The terms of this Privacy Notice are subject to the Sites' Terms of Use Agreement, available at: <http://dorancompanies.com/Doran-Companies-Website-Terms-of-Use-4-29-19.pdf>

This Privacy Notice is subject to periodic changes and updates. These changes are effective upon posting to the Sites. Please check this Privacy Notice periodically for updates. **Carefully read this Privacy Notice before using the Sites.** Your continued use of the Sites constitutes your acceptance of the terms of this Privacy Notice, as amended from time to time. If you do not accept the terms of this Privacy Notice, you may NOT use the Sites or services offered therein.

This Privacy Notice does not apply to the practices of any third parties. In cases where the Sites direct you to the website of any third party, this Privacy Notice does not govern the privacy practices of such third parties, and we ask that you refer to their respective privacy policies for details on their use of your information.

1. ABOUT DORAN COMPANIES

We are a group of business entities that engage in residential and commercial development, general contracting, ownership and management of multi-

family residential and commercial properties. Our dedication to development, architecture, construction, and property management has helped establish us as a trusted and respected provider of these services in today's market.

2. THE PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

The amount, type, and use of the information we collect from you depends upon your use of the Sites.

By using the Sites, you affirm that you are a U.S. resident at least 18 years of age (according to our Terms of Use, available at: <http://dorancompanies.com/Doran-Companies-Website-Terms-of-Use-4-29-19.pdf>), and you are using the Sites for a legitimate purpose such as (1) to submit a question or comment to us; (2) because you are interested in becoming a resident at a Doran-owned/managed residential property; or (3) because you are currently a resident of a Doran-owned/managed residential property.

The personal information we may collect consists of:

- Contact information, including name, e-mail address, place of work, and telephone number;
- Demographic information, such as birthday, age, and gender;
- Geolocation information;
- Correspondence and other information that you send to us;
- Preferences and interests;
- Information regarding your social media accounts, including any social media platforms that interact with the Sites; and
- Additional information as otherwise described to you at the point of collection or that you otherwise provide to us.

How your personal information may used

We may use this personal information (if you provide it to us):

- To provide you with news, products, promotions, services, newsletters, and/or information that you request;
- To respond to you regarding the reason you contacted us;
- To contact you about products, services, and events that we think might be of interest to you;
- To send you promotional materials, special offers, or other

marketing communications, directly, through third parties with which we may partner, or via social media platforms;

- To provide, maintain, administer, or expand the services that we provide;
- To perform research and analyses so that we can improve the quality of our business, the Sites, and other products and services we offer;
- To customize and personalize your use of the Sites;
- To share with certain third parties with which we may partner, contract, or affiliate so that they may market their or our products or services to you.
- To provide to third parties so they can help us perform any of the above-listed tasks or processes; and
- As otherwise described to you at the point of collection or pursuant to your consent.

By submitting any of the personal information identified above to us, you are expecting it to be transferred among Doran-owned/managed entities or to contracted parties.

3. YARDI/RENTCAFÉ

To apply for residency at a Doran-owned/managed residential property, to create a username/password, to submit payment online, or to make certain requests regarding your tenancy at a Doran-owned/managed residential property, you will be directed to a website controlled and managed by a third party. Depending on the Doran-owned/managed residential property, this third party will either be Yardi/RENTCafé ("RENTCafé") or Rental History Reports ("RHR"). We do NOT own or manage the RENTCafé or RHR websites.

Accordingly, any information, personal or otherwise, that you submit through a RENTCafé or RHR website, including but not limited to

- **any username/password that you may create** (along with security question);
- **your payment card information**; or
- **your rental application information** (such as your lease preferences, desired move-in date, unit parameters, residency

information, employment information, income information, Social Security Number, birthdate, government-issued identification number, rental history, criminal history, relevant pet information, vehicle information, emergency contact information, and signature)

is NOT governed by the terms of this Privacy Notice, but is instead governed by RENTCafé or RHR's respective privacy policy.

We are therefore NOT responsible for RENTCafé or RHR's respective privacy practices, policies, or the content of their websites or online services. We encourage you to review RENTCafé or RHR privacy policies.

None of the information that you submit through RENTCafé or RHR is processed or stored on our servers. If and to the extent RENTCafé and/or RHR shares any of your information that you submit to them with us, we will treat it according to this Privacy Notice – as if it were submitted to us directly through the Sites.

4. NON-PERSONAL INFORMATION & COOKIES

During your use of the Sites, we may collect certain non-personal information ("NPI") like your internet service provider, browser type, domain name, website that referred you to the Sites, web pages that you request on the Sites, date and time of those requests, your domain name, and your IP address.

We use NPI to improve your access to the Sites and the Sites' functionality. We use NPI for purposes such as optimizing the performance of the Sites, gauging the Sites' popularity, or otherwise improving your access to the Sites. NPI may also be used to establish trends in activity on the Sites, monitor the Sites' performance, improve the Sites' design, provide services, inform third parties about our services, and for other business purposes. **You hereby disclaim any right to privacy or other interest in NPI that we may collect through the Sites.**

"Cookies" are a type of NPI. They are pieces of code/text that some websites transfer to the computer that is browsing that website, and are used for record-keeping purposes. Use of cookies allows us to provide you with certain conveniences when using the Sites, such as delivering content specific to your interests, providing you with marketing materials that may interest you, or

pre-populating user information to save you from having to re-enter your data at each connection when using features like online payment. We also may use cookies to track the path of users through the Sites, and to keep track of how they arrived at the Sites (for example, via a search engine). Most web browsers allow you to configure your browser's preferences to prevent your browser from accepting new cookies, notify you when you receive a new cookie, or disable cookies altogether. If you would prefer not to receive cookies, you may alter the configuration of your browser to refuse cookies. If you choose to have your browser refuse cookies, it is possible that some areas of the Sites will not function properly when you view them.

5. OTHER PROVISIONS RELATING TO SHARING OF YOUR PERSONAL INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information that we collect.

- **Service Providers:** In addition to our sharing practices described above, we may share your personal information as may be necessary with third-party service providers that perform certain functions or services on our behalf (such as manage databases, perform research and analyses, develop marketing strategies and campaigns, manage our social media presence and connections, perform targeted advertising, or improve our Sites or mobile apps).

On occasion, we will also partner with certain third parties for marketing purposes and provide your name, email address, phone number, and zip code to them. These third parties may use your personal information to conduct research and analyses for us or themselves, develop targeted advertising on our or their behalf, and/or contact you via social media/email to send you special offers, products, promotional materials, or marketing communications (of their own or on our behalf).

- **Business Transfer:** If we sell all or part of our businesses, or make a sale or transfer of assets, or are otherwise involved in a merger or business transfer, or in the unlikely event of bankruptcy, a business reorganization, or similar event, we may transfer any part or all of your personal information as part of such transaction.

- **Administrative or Legal Process:** We may disclose any or all of your personal information to third parties when we have reasonable grounds to believe that use or disclosure is necessary to protect the legal rights, privacy, property, safety, and security of our organization, our corporate affiliates, subsidiaries, business partners, users of our services, or any other person or organization; to enforce our internal policies, to respond to and resolve claims or complaints; to prevent fraud or for risk management purposes; and to comply with or respond to law enforcement, legal/regulatory process, or a request for cooperation by a government or other entity (whether or not legally required).
- **Public Information:** We may share information that is public with third parties. Public information includes content you share with us online or via social media.
- **Non-Personal Information:** We may share NPI (including personal information that has been de-identified and/or aggregated), with advertisers, sponsors, or other third parties for any reason at our sole discretion.

6. LINKS TO OTHER WEBSITES

This Privacy Notice applies only to the information we collect through the Sites. In addition to links to the RENTCafé and RHR websites described above, the Sites may contain links to other websites, online services, or social media platforms such as Twitter or Facebook, that are operated and maintained by third parties and that are not under the control of or maintained by us. Such links do not constitute an endorsement by us of those other websites, the content displayed therein, or the persons or entities associated therewith.

This Privacy Notice does not apply to this third-party content. We are not responsible for the privacy practices, policies, or content of such other websites or online services. We encourage you to review the privacy policies of these third-party websites or services.

7. SECURITY

We have established and implemented appropriate physical, electronic, and managerial procedures to safeguard and secure the personal information that

we collect through the Sites. Your privacy is important to us, and we use commercially reasonable efforts and reasonably available technologies to preserve the security of your personal information and protect it from unauthorized use or disclosure. You understand, however, that no system is perfect, and we cannot ensure or warrant the security of any or all of the personal information that you transmit through the Sites. You are responsible for maintaining the security of your password, and should not use the same password for multiple sites. If you believe your account has been compromised, contact us immediately.

8. CHILDREN'S PRIVACY

We do not knowingly collect, use, or disclose personal information from children under the age of 13. We also do not authorize individuals who are under the age of 13 to use the Sites, nor do we direct our Sites to those under 13 years of age. If we are made aware we have collected personal information from a child under 13 years old in a manner that is inconsistent with the Children's Online Privacy Protection Act, we will delete this information as soon as possible.

9. YOUR CALIFORNIA PRIVACY RIGHTS/DO NOT TRACK DISCLOSURES

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosures of your personal information to third parties for their direct marketing purposes. To make such a request, please contact us.

Some web browsers may transmit "do-not-track" signals to the websites with which you are communicating. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether you intend for these signals to be transmitted, or whether you even are aware of them. Because there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, we currently do not take action in response to these signals.

10. OPT-OUT/RETENTION

If you submit your personal information to us, we may send you promotional emails, newsletters, and similar communications from us. You may opt out of receiving commercial emails from us by clicking on the opt-out or "unsubscribe" link included in the commercial emails you receive or, if such functionality is enabled in the Sites, by unselecting the subscription option in

your profile. Please note that opt-out requests may take some time to be effective. Your opt-out request will not apply to messages that you request or that are not commercial in nature. For example, even if you opt out of receiving unsolicited commercial email messages, we may contact you concerning payments you owe, payments you have made, an application you have submitted, maintenance you have requested, property or unit-specific announcement relevant to you as a resident, or to respond to you regarding the reason you contacted us.

If you choose to submit your postal address to us, you may receive mailings from us as well.

Consistent with our above-stated practices, we will retain your personal information for as long as needed to provide you with our services and otherwise in our discretion. We will retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

11. INTERNATIONAL USERS

Please note that the Sites are directed towards users who reside in the United States. By using the Sites, you affirm that you reside in the United States, and you consent to the collection, storage, processing, and transfer of your information in and to the United States, pursuant to the laws of the United States. We do not knowingly collect, use, or disclose information of European Union residents.

12. CHANGES AND UPDATES

This Privacy Notice is subject to periodic changes and updates. These changes are effective upon posting to the Sites. Please check this Privacy Notice periodically for updates. Your continued use of the Sites constitutes your acceptance of the terms of this Privacy Notice, as amended from time to time. **IF YOU DO NOT AGREE TO FUTURE CHANGES TO THIS PRIVACY NOTICE, YOU MUST STOP USING THE SERVICES AFTER THE EFFECTIVE DATE OF SUCH CHANGES.**

13. CONTACT US

We are always happy to hear from you with your questions or comments. For additional information, or if you have any questions about this Privacy Notice or our privacy practices in general, please contact us by email at

privacy@dorancompanies.com with a subject line of "**Privacy Notice Inquiry**" or by regular mail at:

Doran Companies
7803 Glenroy Road, Suite 200
Bloomington, MN 55439
Attn: Legal Department

Please provide details in your correspondence to enable us to respond and take appropriate action. It may take up to thirty (30) days to see changes or results.