

Privacy Notice for California Residents

Effective Date/Last Updated: January 1, 2020

This Privacy Notice for California Residents (“Notice”) of the company (“Company”, “we” or “our”) applies solely to all visitors, users, and others who reside in the State of California (“consumers”, “residents” or “you”) with respect to personal and other information that may be collected when you interact with the Company, businesses managed or operated by the Company, and websites owned, operated and managed by the Company. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice. By accessing our website or utilizing our services, you consent to the information collection and handling practices outlined in this Notice.

Below you will find answers to the following questions about how we collect, use and share your personal information:

1. What is the personal information that we collect?
2. How do we collect your personal information?
3. How do we use personal information?
4. With whom do we share personal information?
5. What are your rights with respect to your personal information?
6. Whom do you contact if you have questions about this Notice?

1. Information We Collect. We collect personal information for business purposes and may use service providers to collect and process personal information. Such information identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). Personal information does not include: (a) publicly available information from government records; (b) deidentified or aggregated consumer information; or (c) information excluded from the CCPA’s scope, including but not limited to personal information covered by certain sector-specific privacy laws, such as, for example, the Fair Credit Reporting Act (FCRA).

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

- **Identifiers.** *Examples:* 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.
- **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).** *Examples:* A 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.
- **Protected classification characteristics under California or federal law.** *Examples:* Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- **Professional or employment related information.** *Examples:* Job history or performance evaluations.

2. Sources from Which We Collect Personal Information. We obtain the categories of personal information listed above (a) directly from you, such as from forms you complete or residential services in which you enroll, or (b) indirectly from you, such as through information you provide directly to a service provider on our behalf or when we obtain information from credit reporting agencies and payment processors.

3. Purposes for Which Personal Information Will Be Used. We may use, or disclose the personal information we collect, for one or more of the following purposes:

- To assess credit and other information for making rental decisions.
- To fulfill the purpose for which the personal information was collected and provide the requested services. For example, if you share your name and contact information to inquire about rental units, request a rental price or ask a question about our rental units or other services, we will use that personal information to respond to your inquiry. If you provide your personal information to pay, we will use that information to process your payment.

- To process your requests, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries.
- To help maintain the safety, security, and integrity of our services, databases and other technology assets.
- To respond to law enforcement requests and as required by law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

4. Sharing and Disclosure of Personal Information. We may share and disclose or provide your personal information to a service provider or third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. In the preceding twelve (12) months, Company has disclosed the categories of personal information for a business purpose as listed above.

We only share personal information to the extent reasonably necessary for the third-party vendors or service providers to perform the services on our and your behalf. We do not permit third party vendors or service providers to use or disclose your personal information except for the purpose of providing the services we request of them. However, please note that we do not maintain direct control over the privacy policies and practices of service providers or any other third-party companies, agents, or contractors.

We do not sell your personal information.

5. Your Rights and Choices. The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

- **Right to know what personal information is being collected about you.** 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 12 months. Once we receive and confirm your request, we will disclose to you: (i) the categories, specific types, and sources of personal information we collected about you, (ii) our business purpose for collecting that personal information, and (iii) the categories of third parties with whom we share that personal information and the purpose for the disclosure.
- **Data portability right.** You also have the right to request a copy of your personal information in a readily useable format that is transferable to other entities (frequently referred to as “data portability”). If you make a data portability request, we may be (i) restricted from providing certain sensitive personal information in response to the request or (ii) prohibited from granting the request entirely if it presents an unreasonable security risk.
- **Right to request that your personal information be deleted.** 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 request, we will delete or de-identify (or direct our service providers to delete or de-identify) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to, among other things, comply with a legal obligation, complete the transaction for which we collected the personal information, provide a good or service that you requested or otherwise perform our contract with you, or make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- **Right to know if your personal information is sold or disclosed and to whom.**
 - We do not sell your personal information.
- **Right to opt out of the sale of your personal information.**
 - We do not sell your personal information.
- **Right to receive equal service and price, even if you exercise your CCPA privacy rights.**
 - We will not discriminate against you for exercising any of your CCPA rights.

CCPA obligations do not restrict our ability to comply with other federal, state, or local laws. Our compliance with other laws and regulations may interact with your rights under CCPA. For example, we may deny your deletion request if retaining information is necessary for us or our service providers to comply with a legal obligation, such as maintaining hard copies of personal information for select applicants or tenants.

Submitting Consumer Requests – Exercising Access, Data Portability, and Deletion Rights

To exercise your rights described above, please submit a verifiable consumer request to us by either calling us at (833) 660-6862 (toll free) or mailing your request via U.S. Postal Service to:

c/o GK Management Co., Inc.
Attn: CCPA Request
5150 Overland Avenue
Culver City, CA 90230

To respond to your inquiry or request, please provide the following information in your communication with us:

- First and last name;
- Return mailing address, email address and telephone number;
- If you are a current or former tenant of the Company, provide the residential address of the property; and
- Specify the type of CCPA request – you are requesting that Company:
 - *Disclosure*: disclose its collection and use of your personal information;
 - *Copy of Data*: provide you a copy of your personal information in a readily useable format; or
 - *Delete Data*: delete any of your personal information that we collected from you and retained, subject to certain exceptions.

Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may only make a request for access or data portability twice within a 12-month period. The request must: (a) provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information, and (b) 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 and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity.

Response Timing

We will endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require additional time beyond the 45 days, we are entitled to an extension up to an additional 45 days (for a total response timeline of 90 days). If an extension is necessary, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account where possible. If you do not have an account with us, we will deliver our written response to your designated email address. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide 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 useable and should allow you to transmit the information from one entity to another entity without hindrance.

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.

6. Contact Information.

If you have any questions or comments about this Notice, you may contact us by telephone at (833) 660-6862 (toll free) or via U.S. Postal Service at:

c/o GK Management Co., Inc.
Attn: Privacy Notice
5150 Overland Avenue
Culver City, CA 90230

Changes to Our Privacy Notice. We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated notice on the Website and update the Notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.