

Last updated: December 30, 2019

Thomas Safran & Associates (TSA) (“we” or “us” or “our”) respects the privacy of consumers consistent with the requirements of the California Consumer Privacy Act of 2018 as amended (“CCPA”), including users of our website and those who contact us electronically, telephonically or in person in connection with the potential or actual rental of a housing unit and/or related services and opportunities (“user” or “you”). This privacy Policy explains how we collect, use, disclose and safeguard your information when you visit our website ([www.tsahousing.com](http://www.tsahousing.com)) including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”) or provide us with personal information by other means. If you do not agree to the terms of this Privacy Policy, please do not access the Site, telephone us in response to an advertisement or provide us with any personal information electronically, telephonically, in person or by any other means.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site or provision of personal information after the date such revised Privacy Policy is posted.

### **Categories of Personal Information Collected**

We may collect personal information about you in a variety of ways. The personal information we may collect on the Site or when you communicate with us about a potentially available rental housing unit, or when you apply for or rent a housing unit includes the following categories of personal information. The sources from which the information is collected is also identified below.

- **Personal Data:** Personally identifiable information, such as your real name, alias, postal address, email address, telephone number, social security number, driver’s license number, passport number, or other similar identifiers, professional or employment-related information, including income, and education information that you voluntarily give to us when you contact us regarding a rental housing unit, apply for a rental housing unit, rent a rental housing unit, register with the Site, or when you choose to participate in various activities related to the Site, such as contact forms, availability and pricing inquiries, online chat and message boards, electronic payments, and/or request or access services relating to a rental housing unit.

You are under no obligation to provide us with personal information of any kind on the Site; however, your refusal to do so may prevent you from using certain features of the Site or prevent us from communicating with you. Some categories of personal information will be required if you decide to apply for or rent a rental housing unit which we manage (See Data Relating to Application for or Rental of a Housing Unit below).

In addition to your voluntarily providing this information, telephonic marketing systems and computer servers may collect personal contact information such as your name, email address and telephone number for marketing purposes.

- **Derivative Data:** Information our servers automatically collect when you access the Site, such as aliases, unique personal identifier, online identifier Internet Protocol address, your browser type, your operating system, your access times and interaction with the Site, your browsing history, such as the pages you have viewed directly before and after accessing the Site, and geolocation data.
- **Data Relating to Application for or Rental of a Housing Unit:** In addition to the Personal Data described above, if you decide to apply for or rent a rental housing unit at a property we manage, we may also collect personal information bearing on your credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living from a consumer reporting agency subject to regulation under the Fair Credit Reporting Act. Such information is not subject to the provisions of this Privacy Policy or the CCPA so long as it is not used, communicated, disclosed or sold except as authorized by the federal Fair Housing Act.

We may also collect information from public records such as past eviction actions, prior landlords or similarly-situated individuals, which information may help us ascertain the likelihood that you will comply with the terms of your lease agreement and applicable laws.

- **Aggregate Information:** We may collect and track the total number of visitors to the Site, the number of visitors to each page of the Site, Third Party Web Sites (defined below) linked to and other aggregated data collected through our services and we may analyze this data for trends and statistics in the aggregate but such information will be maintained, used and disclosed in aggregate form only and it will not contain personally identifiable information. We may use such information for purposes such as analyzing trends, administering the Site, and to understand how users interact with the Site

## How We Use Your Information

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Site, telephonically or in person to:

- Deliver targeted advertising, coupons, newsletters, and other information regarding promotions, the Site and properties we manage to you.
- Allow you to access amenities, Site features and request service.
- Assist law enforcement and respond to subpoena.
- Compile anonymous statistical data and analysis for use internally or with third parties.

- Create and manage your account.
- Email you regarding business-related communications.
- Enable user-to-user communications.
- Generate a personal profile about you to make future visits to the Site or interactions with our team members more personalized.
- Increase the efficiency and operation of the site.
- Monitor and analyze usage and trends to improve your experience with the site.
- Notify you of updates to the site.
- Offer new products, services, and/or recommendations to you.
- Perform other business activities, as needed.
- Provide electronic payment alternatives.
- Request feedback and contact you about your use of the site.
- Resolve disputes and troubleshoot problems.
- Send you a newsletter.
- Solicit support for the site.

### **Disclosure of Your Information**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

- **By Law or to Protect Rights:** If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.
- **Third-Party Service Providers:** We may share your information with third parties that perform services for us or on our behalf, including third-party utility billing providers, package/locker service providers, insurance trackers and brokers, valet trash providers, concierge service providers, cable companies, payment processing, data analysis, email delivery, in-person delivery, hosting services, customer service, and marketing assistance.
- **Marketing Communications:** With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law.

- **Third-Party Advertisers:** We may use third-party advertising companies to serve ads when you visit the Site. These companies may use information about your visits to the Site and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.
- **Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Business Partners:** We may share your information with our business partners to offer you certain products, services or promotions.
- **Other Third Parties:** We may share your information with advertisers, owner(s) of the rental housing unit(s) in which you showed interest or rented, and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law, including cable companies, insurance companies, phone companies, internet service providers and the like.
- **Sale or Bankruptcy:** If we, or the owner of the rental housing unit(s) in which you expressed interest, reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we or the property owner go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

### Tracking Technologies

- **Cookies and Web Beacons:** We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site to help customize the Site and improve your experience. When you access the Site, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Site. You may not decline web beacons; however, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site to help customize the Site and improve your experience. If we use cookies, information on how we use cookies, will be contained in the Cookie Policy posted on the Site, which is incorporated into this Privacy Policy.

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

- **IP Address:** Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP Address is identified and logged automatically in our server log files whenever a user visits the website, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the internet and is done automatically by many websites. We use IP Addresses for purposes such as calculating website usage levels, helping diagnose server problems, and administering the website.
- **Internet-Based Advertising:** Additionally, we may use third-party software to serve ads on the Site, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us.
- **Website Analytics:** We may also partner with selected third-party vendors, such as Google Analytics, and others, to allow tracking technologies and remarketing services on the Site through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Site, determine the popularity of certain content and better understand online activity. By accessing the Site, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors; however, if you do not want any information to be collected and used by tracking technologies, you can visit the third-party vendor's site.

### **Third-Party Websites**

The Site may contain links to third-party websites and applications of interest, including property sites, advertisements, service providers, job boards, and external services, that are not hosted by us. Once you have used these links to leave the Site, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Site.

## **Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer or other device (e.g. smartphone, table, iPad, etc.), to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing other services relating to website activity and internet 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. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser; however, please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## **Security of Your Information**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## **Social Media Sites**

TSA provides experiences on social media platforms such as Facebook®, YouTube, LinkedIn®, Instagram® and others that enable online sharing and collaboration among users who have registered with them. All social media websites referenced on the TSA website, or on social media websites in which TSA has a presence, are controlled and administered by a third party, are not owned or controlled by TSA, have different privacy policies from TSA, and this TSA Online Privacy Notice does not apply to those sites. Any content you post on social media websites is subject to the privacy policies of those platforms. You should refer to their privacy policies to better understand your rights and obligations with regard to such content and their privacy and information sharing practices.

## **Links to Other Websites**

The Site may contain links to third-party websites and applications of interest, including property sites, advertisements, service providers, job boards, and external services, that are not hosted by us. Once you have used these links to leave the Site, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the

privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Site.

### **Terminated Relationships**

If your relationship is terminated we will not share information we have collected about you, except as permitted or required by law.

### **Policy for Children**

We recognize the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. Neither the Site nor our services are intended for children under the age of 18. We do not target our services or this Site to children under 18. We also do not knowingly collect personally identifiable information from children under the age of 16. If you become aware of any data we have collected from children under age 16, please contact us using the contact information provided below.

### **Updates to this Online Privacy Notice**

This Online Privacy Notice is subject to change. Please review it periodically. If we make any changes, we will revise the "Last updated" date at the top of this Notice. Any changes to this Notice will become effective when posted on this website. Your use of the website following these changes means that you accept the revised Notice.

### **Controls for Do-Not-Track Features**

Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy. Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. If you set the DNT signal on your browser, we will respond to such DNT browser signals.

### **Options Regarding Your Information: Emails and Communications**

- **Emails and Communications:** If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by contacting us using the contact information provided below.

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

## California Privacy Rights

The CCPA, codified at California Civil Code Section 1798.100 *et seq.*, permits our users who are California residents to request and obtain from us, no more than twice in a twelve-month period and free of charge, information about: (1) the categories of personal information we collected about the user, (2) the categories of sources from which the personal information is collected, (3) the business or commercial purpose for collecting the personal information, (4) the categories of third parties with whom the business shares personal information, and (5) the specific pieces of personal information we collected about you. Information will be provided within 45 days of receiving a verifiable consumer request.

In the preceding 12 months, we have collected the personal data referenced above, which has been used and disclosed in the manner described above and for the purposes described above.

The CCPA defines “selling” and “sold,” to mean “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration.” Cal. Civ. Cod § 1798.140(t). Some of the disclosures identified above may be considered “selling” under this definition. You have the right, at any time, to direct us not to sell your personal information. This right is referred to as the right to opt-out.

If you are a California resident and would like to make a request for disclosure or exercise your right to opt-out, please submit your request by using the contact information provided below, which includes two or more designated methods for submitting requests for information including a toll-free telephone number, although we would encourage you to make your request in writing via either electronic or U.S. mail. We will not discriminate against you for exercising any of your rights under the CCPA.

In addition, California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

## **Contact Us**

If you have any questions regarding this Online Privacy Notice call us at 323-820-4888 (TTY: 800-855-7100) or write to us at:

Thomas Safran and Associates  
Attn: Privacy Policy Administrator  
P.O. Box 49898  
Los Angeles, CA 90049  
Email:  
TTY: (800) 855-7100