

CONSUMER DATA PROTECTION/PRIVACY POLICY HOMETOWN AMERICA, L.L.C. AND ITS AFFILIATES

This Consumer Data Protection / Privacy Policy (this “Privacy Policy”) applies to Hometown America, L.L.C., a Delaware limited liability company (“Hometown America”), and each of its affiliates listed on Appendix A attached (such affiliates, together with Hometown, the “Hometown Parties”). Certain provisions are only applicable to California residents, consumers, affiliates, and employees (collectively known as “Hometown California”).

Effective date: January 1, 2020

Hometown America (“Company” “us”, “we”, or “our”) operates the <http://www.hometownamerica.com> website (“Website”), and provides various services to our residents, including residency and access to amenities offered within our communities (hereinafter collectively referred to as the “Services”). Additionally, this Privacy Policy applies to our employees, as it relates to their employment.

This Privacy Policy informs you of our policies regarding the collection, use, protection, and disclosure of your data – including your personal information and the choices you have associated with that data.

Our Privacy Policy is designed to advise you about how we collect, use, protect, and disclose the information that we collect and/or receive about individuals, applicants, and employees. It also explains your privacy rights, and how you can manage the privacy of your Personal Information. Please note that this Privacy Policy does not govern the practices of third parties, including our partners, affiliates, third party service providers, and/or advertisers, even when those services are branded as, or provided on behalf of, the Company. Information collected from you by others, such as third party websites that you access through links on the Website, are governed by those entities’ privacy policies.

I. Definitions

- **Personal Information (also known as “Personal Data”):** Personal Information means data about a particular individual or household that identifies, relates to, describes, could be reasonably linked with, or could be used to identify that person or household (or from those and other information either in our possession or likely to come into our possession). Personal information, as defined in the California Consumer Privacy Act (CCPA) and consumer records law, includes items such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, credit card number, debit card number, any other financial information, medical information, health insurance information, contact information, insurance policy number, education, employment, employment history, financial information, medical information and health information. It also includes other information that may be associated with your Personal Information, such as your Usage Data, location, preferences or interests, if that information can be used to identify you or your household.
- Personal information does not include (a) publicly available information from government records; (b) deidentified or aggregated consumer information, and (c) information excluded from the CCPA's scope, like: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; personal information covered by certain sector-specific privacy

laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

- **User:** Any individual who uses our Services or is employed by us and is the subject of Personal Information collected and/or processed.

II. Information Collection and Use

We use your information to provide the Services that you request, and to improve the Services we offer to you. We use information provided by employees to carry out employee-related functions. By using our Services or by being employed by us, you agree to the collection and use of information in accordance with this Privacy Policy.

a. Types of Data Collected

We collect several different types of information for various purposes to provide and improve our Service to you.

Categories of Personal Information Collected by Hometown America in the Past 12 Months

Category A Identifiers	Category A includes: Identifiers, such as 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.
Hometown America collected Personal Information in the form of Category A in the past 12 months.	
Category B Personal Information	Personal information, as defined in the CCPA and consumer records law, such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, credit card number, debit card number, any other financial information, medical information, health insurance information, contact information, insurance policy number, education, employment, employment history, financial information, medical information and health information.
Hometown America collected Personal Information in the form of Category B in the past 12 months.	
Category C Characteristics	Characteristics of protected classifications under California or federal law.
Hometown America collected Personal Information in the form of Category C in the past 12 months.	
Category D Commercial Information	Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Hometown America collected Personal Information in the form of Category D in the past 12 months.	
Category E Biometrics	Biometric information means an individual's physiological, biological, or behavioral characteristics, including an individual's deoxyribonucleic acid (DNA), that can be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an

	identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.
Hometown America did not collect Personal Information in the form of Category E in the past 12 months.	
Category F Internet Activity	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.
Hometown America did not collect Personal Information in the form of Category F in the past 12 months.	
Category G Geolocation	Geolocation data, such as device or personal location.
Hometown America collected Personal Information in the form of Category G in the past 12 months.	
Category H Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information, such as images and audio, video or call recordings created in connection with our business activities.
Hometown America collected Personal Information in the form of Category H in the past 12 months.	
Category I Professional Information	Professional or employment-related information, such as work history and prior employer, human resources data and data necessary for benefits and related administrative services.
Hometown America collected Personal Information in the form of Category I in the past 12 months.	
Category J Education	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records.
Hometown America did not collect Personal Information in the form of Category J in the past 12 months.	
Category K Inferences	Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Hometown America collected Personal Information in the form of Category K in the past 12 months.	

III. How We Collect Your Information

Hometown America collects and obtains your information in a few ways: there is information that you choose to give to us (a) accessing our website and filling out the online form, (b) by calling the phone numbers on our website, and (c) by filling out our Residency Application. We also collect information through the Resident Contact Information form and through payment processes. Finally, information is collected from employees through various employment actions. This information is collected and obtained (a) when you choose to apply for employment and provide information for the application process, and (b) upon hire to enable us to carryout the functions of the employer-employee relationship, such as processing payroll, administering and maintaining group health insurance and retirement services, and obtaining and maintaining commercial insurance among others.

IV. Purposes for Collecting, Processing, and Using Your Information

a. Business and Commercial Purposes for Collection

THE COMPANY collects, processes (or asks our service providers to process on our behalf), and uses your information to provide the Services we make available to you. We therefore will collect and use your information for a variety of reasons, including:

- To perform a contract with you, or provide those Services you have requested of Hometown America (for instance, we need to collect and process your information when you become a resident of a community);
- You have otherwise given us your consent and permission to do so (for example, you have consented to receive our newsletter and provided your email address for that purpose);
- To aid in detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- To comply with applicable laws, in response to a lawful and enforceable request by a law enforcement, judicial, or other public authority, or in connection with an applicable legal obligation;
- To perform background, credit, and other inquiries to determine suitability for leasing, renting, or purchasing;
- To conduct our business relationship with you and to offer quality products and services that customers seek;
- To identify individuals interested in contact from Hometown America;
- To induce individuals to lease, rent or buy real property;
- To process rents, fees or other charges;
- To ensure compliance with lease documents, including associated documents such as Community Rules and Regulations; and
- To carry out employment-related functions and follow best practices in relation to recordkeeping.

V. How We Use Your Information

As noted elsewhere in this Privacy Policy, Hometown America uses your information to provide our Services to you, including our Website.

Such other general uses include:

- To provide and maintain our Services;
- To notify you about changes to our Services;
- To allow you to participate in interactive features of our Services when you choose to do so;
- To provide customer support to you and our other members, customers, and visitors;
- To gather analysis or valuable information so that we can improve our Services;
- To monitor the usage of our Services;
- To detect, prevent and address technical issues; and
- To provide you with news via our newsletter, special offers, marketing or promotional materials, and general information about other goods, services and events which we offer that are similar to those that you have already purchased or inquired about, or which we believe may be of interest to you, unless you have opted not to receive such information. You may opt out of

receiving any, or all, of these communications from us by contacting us at the contact information listed below.

VI. Retention of Data

Hometown America does not sell your information to any third party. If Hometown America were to begin selling your information to any third party, it would not do so without your permission, and will not sell the Personal Information of anyone under 16 without applicable consent. However, Hometown America may disclose your information in a number of ways in order to provide our Services to you.

We may also disclose or share your information for the following purposes:

- To comply with a legal obligation;
- To obtain financial services for the purposes of financing, refinancing, acquiring or selling a location/property;
- To protect and defend Hometown America's rights or property;
- To prevent or investigate possible wrongdoing in connection with the Services; and
- To protect the personal safety of users of the Services or the public and in detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

a. Categories of Third Parties that Receive Personal Information from Hometown America (Categories of Information Shared and Disclosed)

We share or otherwise disclose individuals' personal information to the following categories of third parties:

- **Service Providers:** We employ third party service providers, companies, individuals, and agents to facilitate and help us provide our Services to you, such as credit card companies (at your direction, and to process payments), ADP (for employees), and others. Such Service Providers perform tasks or functions on our behalf, provide Services-related services, or assist us in analyzing how our Services are used or delivered. These third parties are granted access to your information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- **Lenders:** When we are refinancing, financing, acquiring or selling a location/property, or similar financial services some personal information collected by Hometown America is disclosed to obtain financial services for the purposes of financing, refinancing, acquiring or selling a location/property.

b. Categories of Personal Information Disclosed

Hometown America has disclosed the following categories of Personal Information in the last 12 months:

- Personal information as it relates to the employee-employer relationship from Categories A, B, C, H, I and K.
- Employee and resident information from Categories A, B, D and I for the purposes described in Lenders above.

VII. Retention of Data

Hometown America will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to provide our Services to you and for your employment, comply with our legal obligations (for example, if we are required to retain your information in accordance with applicable laws), resolve disputes and enforce our legal agreements and policies.

VIII. Accuracy of Data

We devote substantial resources and effort seeking to ensure that our records of your information are complete and correct. If an error is noted on your statement or in any other communication from us or if you need to update any personal information, please contact us promptly at the number listed on your account materials.

IX. Your Data Protection & Privacy Rights

For California residents, Hometown America aims to take reasonable steps to allow you to correct, amend, **delete** or limit the use of your Personal Information, and exercise other rights available under applicable law. You are entitled to the following:

- **Right to Access / Disclosure:** To have access to your Personal Information upon simple request – that is, you may receive a copy of such data upon receipt of a verifiable request, along with other information related to the processing. This includes (a) the categories of personal information it has collected about that consumer; (b) categories of sources from which the personal information is collected; (c) business or commercial purpose for collecting or selling personal information (if such information is being sold); (d) categories of third parties with whom the business shares personal information (if such information is shared); and (e) the specific pieces of personal information it has collected about that consumer.
- **Disclosure of Direct Marketers:** To have access upon simple request, and free of charge, the categories and names of addresses of third parties that have received Personal Information for direct marketing purposes. Currently, this practice is not done by Hometown America.
- **Selling, Sharing, or Disclosing Personal Information:** Upon receipt of a verifiable request, to obtain a list of:
 - The categories of Personal Information collected about you, sold to third parties, or disclosed to third parties for business purposes;
 - The categories of Personal Information sold and disclosed within the last 12 months;
 - The categories of sources from which Personal Information is collected;
 - The business or commercial purpose for collecting or selling Personal Information; and
 - The categories of third parties with whom Personal Information is shared, sold, or disclosed for a business purpose.
- **Right to Opt-Out of the Sale of Personal Information:** California residents have the right to opt-out of the sale of their Personal Information under certain circumstances. Currently, Hometown America does not sell personal information.

- **Right to Correction:** To correct your Personal Information if you find it is inaccurate, incomplete or obsolete.
- **Right to Deletion / “Right to be Forgotten”:** To obtain the deletion of your Personal Information in the situations set forth by applicable data protection law.
- **Withdraw of Consent to Processing:** To withdraw your consent to the data processing without affecting the lawfulness of processing, where your Personal Information has been collected and processed based on your consent and not any other basis.
- **Right to Object:** To object to the processing of your Personal Information under certain circumstances, in which case we may ask you to justify your request by explaining to us your particular situation.
- **Right to Restrict Processing:** To request limits to the processing of your data, when allowed by and in circumstances set forth under applicable law.
- **Right to Non-Discrimination.** As defined under relevant law, you have a right to non-discrimination in the Services or quality of Services you receive from us for exercising your rights.

Please contact us at the information in the “Contact Us” Section below in relation to exercising these rights. Note that we may ask you to verify your identity before responding to such requests. Hometown America shall honor such rights and requests and disclose and deliver the required information to a consumer or employee free of charge within 45 days of receiving a verifiable consumer request from the consumer or employee. We shall promptly take steps to determine whether the request is a verifiable consumer request, but this shall not extend our duty to disclose and deliver the information within 45 days of receipt of the consumer’s or employee’s request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary, provided the consumer or employee is provided notice of the extension within the first 45-day period. The disclosure shall cover the 12-month period preceding the business’ receipt of the verifiable consumer request and shall be made in writing and delivered through the consumer’s or employee’s account with us, if the consumer or employee maintains an account with the business, or by mail or electronically at the consumer’s or employee’s option if the consumer or employee does not maintain an account with the business, in a readily useable format that allows the consumer or employee to transmit this information from one entity to another entity without hindrance. We may require authentication of the consumer or employee that is reasonable in light of the nature of the personal information requested, but shall not require the consumer or employee to create an account with the business in order to make a verifiable consumer request. If the consumer or employee maintains an account with the business, the business may require the consumer or employee to submit the request through that account. We may provide personal information to a consumer or employee at any time, but shall not be required to provide personal information to a consumer or employee more than twice in a 12-month period.

X. Analytics

We may use third-party Service Providers to monitor and analyze the use of our Website.

Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google services.

Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on Google’s privacy practices, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

Facebook Ads. Facebook Custom Audiences is used to deliver advertisements to Website visitors on Facebook and their third-party networks based on email addresses and phone numbers. Click here to learn more about [Facebook Custom Audiences](#). We may also use information associated with visitor social media accounts, such as demographic information, to improve our marketing efforts if that individual connects those social media accounts to a Website profile.

Hometown America may use information we collect from users to display advertisements. One example is if a prospect/customer submits their email address to us either by means of the website or via social media, then we could potentially serve ads via Facebook or one of their Third-Party networks to those individuals as well.

For more information on Facebook’s privacy policy, please visit this web page: [Facebook’s Privacy Policy](#). For more information on Facebook’s use of cookies, please visit this web page: [Cookies & Other Storage Technologies associated with Facebook](#). You may learn how to opt-out of receiving advertisements based on your email address/phone number by visiting the section titled, “How can you control Facebook’s use of cookies to show you ads?”

XI. Children’s Privacy

All of our Services, including our Website, are intended for adult audiences, and are not meant to address anyone under the age of 18 (“Children”). As such, children under 18 may not use our Website. If you are under 18, do not attempt to register for or use any of our Services, including our Website and do not provide us any Personal Information about yourself.

We do not knowingly collect Personal Information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has violated this Privacy Policy and provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children without verification of parental consent, we will take steps to remove that information from our servers.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. While we reserve the right to make changes to our Privacy Policy at any time and at our sole discretion, we will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Website prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

XII. Consumer Data Protection/Privacy Policy Coordinator

Hometown America has delegated to its Vice President, in coordination with the data processing manager and the computer operations manager, the authority to appoint an individual to serve as Consumer Data Protection/Privacy Policy Coordinator who will be responsible for the day-to-day application and implementation of this Policy, including the review and approval of forms of Customer Notices and the dissemination thereof.

XIII. Contact Us

If you have any questions about this Privacy Policy, our practices, your Personal Information, or your rights and choices under applicable laws, please contact us:

- Postal Address: Hometown America, 150 N. Wacker Dr., Suite 2800, Chicago, IL 60606, Attention: Chief Privacy Officer.
- Email: Please send an e-mail to our Chief Privacy Officer at Privacy@HometownAmerica.com.
- Phone: Please call 1-877-941-2602 and request that our Chief Privacy Officer contact you.

APPENDIX A
HOMETOWN AMERICA, L.L.C.
LIST OF AFFILIATED ENTITIES

CWS Communities LP
Del Tura Phase I, LLC
Del Tura Phase II, LLC
Euromerican Investment Group, Ltd.
Fairways Country Club, Inc.
Fairways SPE LLC
Hometown Alden Place, L.L.C.
Hometown America Communities, Inc.
Hometown America Foundation
Hometown America Holdings, L.L.C.
Hometown America Insurance Services, L.L.C.
Hometown America Management Corp.
Hometown America Management, L.L.C.
Hometown America Management, L.P
Hometown America, L.L.C.
Hometown Angola Beach, L.L.C.
Hometown Angola Land, L.L.C.
Hometown Arbor Gate, L.L.C.
Hometown Arrowhead, L.L.C.
Hometown Audubon, L.L.C.
Hometown Barclay Farms, L.L.C.
Hometown Bayscene, L.L.C.
Hometown Brighton at Barnegat, LLC
Hometown Carriage Estates, L.L.C.
Hometown Clearwater Village, L.L.C.
Hometown Colonial Estates, L.L.C.
Hometown Colony, L.L.C.
Hometown Colony Land, L.L.C.
Hometown Communities Limited Partnership
Hometown Communities, LLC
Hometown Countryview, L.L.C.
Hometown Creekside Estates, L.L.C.
Hometown Crescent Run, L.L.C.
Hometown Delta Villa, L.L.C.
Hometown Eastridge, L.L.C.
Hometown Grand Royal Estates, L.L.C.
Hometown Green River Village GP, L.L.C.
Hometown Green River Village, L.P.
Hometown Highlands Florida, L.L.C.
Hometown Homes Realty Illinois, L.L.C.
Hometown Homes Realty MA, L.L.C.
Hometown Insurance Investment I, L.L.C.
Hometown Jurupa Hills, L.L.C.
Hometown Laguna Terrace, L.L.C.
Hometown Lakehills Estates, L.L.C.
Hometown Lakes at Leesburg, L.L.C.
Hometown Lakes of Melbourne, L.L.C.
Hometown Landmark, L.L.C.
Hometown Ledgewood, L.L.C.
Hometown Leisurewoods, L.L.C.
Hometown Liberty Village, L.L.C.
Hometown Little Manatee, L.L.C.
Hometown Maple Valley, L.L.C.
Hometown Mays Landing MHC, L.L.C.
Hometown Mission Gorge, L.L.C.
Hometown Monterey Oaks, L.L.C.
Hometown Mountain View Estates, L.L.C.
Hometown Oak Point I, L.L.C.
Hometown Oak Point II, L.L.C.
Hometown Oakhill, L.L.C.
Hometown Oaks of Weymouth, L.L.C.
Hometown Oak Tree Ranch, L.L.C.
Hometown Orchard, L.L.C.
Hometown Origen Investment I, L.L.C.
Hometown Palm Valley, L.L.C.
Hometown Pine Lakes MHC, L.L.C.
Hometown Pine & Pond, L.L.C.
Hometown Pine & Pond Storage, L.L.C.
Hometown Pinelake Gardens, L.L.C.
Hometown Ponderosa, L.L.C.
Hometown Poway Royal Estates, L.L.C.
Hometown Ramona Villa, L.L.C.
Hometown Rehoboth, L.L.C.
Hometown Residential Manager, L.L.C.
Hometown Saddlebrook, L.L.C.
Hometown Saddlebrook Services, L.L.C.
Hometown Southern Pines, L.L.C.
Hometown Spanish Ranch II, L.L.C.
Hometown Special Member, L.L.C.
Hometown Sunny South, L.L.C.
Hometown Thurms Estates, L.L.C.
Hometown University Lakes, L.L.C.
Hometown Village of Cool Branch, L.L.C.
Hometown Westwood Estates, L.L.C.
HTA Propane, L.L.C.
Leisurewoods Land, L.L.C.
Miller's Woods MHC, L.L.C.
Mullica Woods MHC, L.L.C.
Parkwood Branch Terrace SPE LLC
Plaza Del Rey MHC, L.L.C.
River Bend MHC, L.L.C.
Saddlebrook 60, L.L.C.
Sandstone MHC, LLC
Second Merger Sub, LLC
Shady Lane SPE LLC
Sun Coast Investment Group Limited
Tanglewood MHC, L.L.C.
Tara Woods SPE LLC
The Lakes at Leesburg, Ltd.