

## Related Privacy Policy

The Related Companies, L.P., its divisions, affiliates, and subsidiaries (“Related”) have created this privacy policy in order to demonstrate our firm commitment to consumer privacy. Related recognizes the importance of protecting the privacy of personal and financial information you may provide Related through this web site or through other means. When you access our web sites, opt to fill out an information submission form, or otherwise provide Related with your personal information, such as your name, address, email address, or phone number, you give Related your consent to process and use such submitted information in accordance with the terms and conditions of this Privacy Policy. The following describes the general information-gathering and dissemination practices for our websites, including those associated with specific Related properties, as well as those our affiliates, subsidiaries, and divisions (the “Related Web sites”).

### *Collection of Personal Information*

Related collects personal information when you fill out an online form that is submitted to Related via a Related Web site, including, but not limited to, those forms requesting information about Related or any of our properties, or requests for someone at Related to contact you. The submission forms require you to provide contact information (such as name and e-mail address), and in some cases ask for other optional information (such as your phone number, home address and contact preferences).

### *Use and Disclosure of Personal Information*

Related uses the information you provide us for our general commercial purposes, such as to send you information about our company, our properties or our affiliates, as well as to contact you when necessary. You may opt-out of receiving future mailings or e-mails in accordance with the “*Opt-Out*” section below.

Related may share your personal information if we have your consent or authorization to do so. You agree that we may share your information with our affiliates and subsidiaries that may use it for their own commercial purposes including analytics, marketing, or otherwise in accordance with this Privacy Policy. Otherwise, Related may share your personal information only under the following circumstances:

- **Agents.** Related employs other companies and individuals to perform functions on our behalf (e.g., processing transactions that you have requested, creating and maintaining the Related Web sites, sending postal mail and e-mail, removing repetitive information from customer lists, analyzing data, providing marketing assistance and providing customer service) (“Agents”). Our Agents will have access to personally identifiable information solely to perform their functions and provide their services to Related, and for no other purpose.
- **Business Transfers.** As Related continues to develop our business, Related may sell or buy assets. In such transactions, customer information generally is one of the transferred business assets. Thus, if Related or a subsidiary Related controls, sells substantially all of its assets, or is acquired by another entity, customer information may be one of the transferred assets and you agree that you consent to such transfer.
- **Protection of Related and Others.** Related releases account and other personal information when such release is necessary to comply with the law; enforce or apply our Terms of Use or other agreements; protect the rights, property, or safety of Related and our users; or in connection with a legal claim or proceeding. This includes exchanging information with other companies and organizations as part of our efforts to prevent fraud and identity theft.

### *Collection, Use, and Disclosure of Non-Personal Information*

“Non-Personal Information” contains nothing that could identify you personally. Related may collect such Non-Personal Information, such as demographic and profile data, through the Related Web sites. Related may aggregate Non-Personal Information and share it with our affiliated companies and other third parties.

### *Security*

Related uses physical, logical, and procedural security measures to protect the information you provide to Related, but information you provide us by email is not secured. However, while Related uses commercially reasonable steps to protect the personal information you provide to Related from unauthorized access, use or disclosure, you accept that no Internet data transmission can be guaranteed to be secure from access by unintended recipients. You also play a role in protecting your information. Please safeguard any user name and password you submit and do not share them with others. Any action taken while securely logged into your account will be considered authorized by you.

#### *Accuracy and Retention*

If you have created an account with us you are required to keep your information accurate and up to date. You are entitled to request access to and correction of all personal data you provide to Related, or to remove your name from Related's contact list at any time by contacting us. If you choose to pay your rent or other expenses via a Related Web site, you will be required to provide Related with your credit card or other form of payment and billing information as part of the transaction.

#### *Opt-Out*

In order to opt-out of future e-mails on a given topic, you should click on the UNSUBSCRIBE link that is available at the bottom of each message. This will halt future communications for that specific function. Related will process your opt-out request promptly, but it may take up to two weeks for the request to be processed through our systems and you may receive communications from Related during that period. To re-subscribe, you may return to the relevant Web site and resubmit the request form.

For Residents, you may modify your e-mail preferences through the Profile section of the Resident Circle website.

#### *IP Address*

Related uses your Internet protocol (IP) address to help diagnose problems with our server, as well as to administer the Related Web sites. Your IP address is used to help identify you and to gather broad demographic information. Related may use your IP address to help protect ourselves and our partners from fraud. For system administration purposes, Related also logs IP server addresses and catalogues traffic patterns through the Related Web sites. However, Related does not link this information to users' personal information.

#### *Cookies*

Cookies are pieces of data assigned by a Web server that uniquely identify the browser on your computer. Web sites typically use temporary cookies called "session" cookies to ensure that you are recognized when you move from page to page within one site and that any information you have entered is remembered. For example, if an e-commerce site did not use session cookies then items placed in a shopping basket would disappear by the time you reach the checkout. Web sites also use cookies called "persistent" cookies to enable a Web site to remember you on subsequent visits, speeding up or enhancing your experience of services or functions offered. Related may set and access both persistent and session cookies on your computer. You have the option to accept or disable cookies at any time through your Web browser. Visit the "help" portion of your toolbar for more information. Your decision to accept or reject a Related cookie will not affect your ability to access the Related Web site, however, the site may not function as intended if a cookie is rejected. Our sites' cookies are not linked to any personally identifiable information. Related does not use technology that responds to "do-not-track" signals from your web browser.

#### *Google AdWords*

In addition to using cookies, Related uses Google AdWords remarketing service to advertise on third party websites to previous visitors to our site. We may also permit certain third party companies to help us tailor advertising that we think may be of interest to users and to collect and use other data about user activities on our site or a user's online activities over time and across different websites. These companies may deliver ads that might also place cookies and otherwise track user behavior. If you would like to opt out of retargeted advertising from Related that occurs when visiting third party sites, please visit <http://www.networkadvertising.org/choices> to learn about your options.

#### *Links*

This Web site may contain links to other web sites that are operated or owned by third parties. Please note that when you click on one of these links, you are navigating to another web site. Related encourages you to read the privacy statements of these linked sites as their privacy policies may differ from ours. Related is not responsible or liable for the privacy practices or the content of these third-party web sites, and you use them at your own risk.

#### *Modification And Notification Of Changes*

Related posts the current Effective Date of our Privacy Policy below. Related may, at our sole discretion, edit this Privacy Policy from time to time, so you may wish to check it each time you submit personal information through a Related Web site. We will post a new Effective Date when we update this Privacy Policy.

#### *Age Restriction*

Related does not intend to collect personally identifiable information from anyone under the age of eighteen (18). If you are under eighteen, please ask your parents to use the Related Web sites. Please do not submit any personal information or details if you are under the age of eighteen.

#### *California Privacy Rights*

California Civil Code Section 1798.83 permits customers of Related who are California residents to request certain information regarding its disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [CaliforniaPrivacy@related.com](mailto:CaliforniaPrivacy@related.com). Please note that Related is only required to respond to one request per customer each year, and Related is not required to respond to requests made by means other than through this e-mail address.

#### *Contacting Us*

If you have any questions about this Privacy Policy, the practices of any of the Related Web sites or the information you have submitted to the Related Web sites, you can contact Related at [webinfo@related.com](mailto:webinfo@related.com). Effective Date: September 12, 2014.

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