

ROCKROSE PRIVACY NOTICE

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1. **OVERVIEW**

Rockrose Development L.L.C. and its affiliates, subsidiaries and related companies (“Rockrose”, “we”, “us”, “our”). respect your privacy. This Privacy Notice explains our practices as data controller with respect to personal data we collect and process in connection with your relationship with us and the rights you have in relation to your personal data. This includes information we collect through, or in association with, our website located at <https://rockrose.com/>, together with any services that we may provide to you from time to time, or any personal data collected via our website and social media sites (such as LinkedIn, Facebook, Instagram, Twitter and Pinterest) or otherwise through your interactions with us on the website, email or telephone (collectively, the “Services”).

If you have questions, comments, or concerns about this Privacy Notice or our processing of personal information, please see the bottom of this Privacy Notice for information about how to contact us.

This is a global Privacy Notice and so your specific privacy rights may differ depending on your jurisdiction. If you are based within the UK or EU, we are subject to the UK General Data Protection Regulation (“**UK GDPR**”) and the EU General Data Protection Regulation (“**EU GDPR**”) (together, the “**GDPR**”) in relation to our services. Please refer to section “**EU and UK Privacy Rights**” to review the specific rights you have. For those based in China, please refer to section “**PIPL Privacy Rights**”.

Please review the following to understand how we process personal data about you. By using any of our Services, whether by visiting our website or otherwise, and/or by voluntarily providing personal data to us, you acknowledge that you have read and understand the practices contained in this Privacy Notice, including (if you are based within the EU or UK) that you are sharing your personal data with an organization that is based in the United States of America. This Privacy Notice may be revised from time to time, so please ensure that you check this Privacy Notice periodically to remain fully informed.

2. WHAT INFORMATION DO WE COLLECT?

The personal data we collect about you may vary based upon the Services we are providing to you, or you are providing to us. For example, we may collect the following information from prospective tenants, applicants, tenants, and visitors:

- **Prospective tenants, applicants and tenants:** Personal data, such as name, address and contact information, including email address and telephone number, date of birth, company name and position, tax identification number and/or social security number; financial account information; government issued identification; historical leasing information; car details for parking registration; geolocation data, such as location data based upon security badge usage or visitor access system usage; electronic, visual or similar information, such as CCTV systems at Rockrose’s properties; and professional or employment-related information;
- **Visitors at Our Properties:** Personal data, such as name, government issued identification, address, email address and telephone number.

You have choices about certain information we collect. When you are asked to provide information, you may decline to do so; but if you choose not to provide information that is necessary to provide any aspect of our Services, you may not be able to use those Services. In addition, as described below in the section “**Your Choices**” it is possible to change your browser settings to block the automatic collection of certain information.

Finally, we may collect data from or about you that is not identifiable to you or otherwise associated with you, such as aggregated data, and is not personal data. To the extent this data is stored or associated with personal data, it will be treated as personal data; otherwise, the data is not subject to this notice.

3. HOW WE COLLECT INFORMATION FROM YOU?

We collect personal data from and about you through the Services, including:

- **Information You Share With Us.** When you provide it to us directly whether online, by email, phone, or in-person, for example, when you create an account, sign-up to receive emails from us, fill out and submit forms (such as applying for a rental opportunity or through the contact form), contact us, or participate in our market research surveys, questionnaires, written correspondence, or when you process a payment,

and provide your shipping and mailing address. In-person and offline collection may include when you submit a paper application to rent an apartment, make a rent payment by check, or call or visit the management office at a Rockrose property.

- **Information Collected Automatically From You.** For example, through logging and analytics tools, cookies, pixel tags (such as Google Analytics), and as a result of your use of and access to the Services, or through your interactions with us on social media websites (such as LinkedIn, Facebook, Instagram, Twitter and Pinterest). Please see section “**Cookies and Tracking Technology**” below for more information on this.
- **Information Collected From our Service Providers.** The information we collect may vary based upon the Services we are providing to you, or you are providing to us. For example, we may collect the following information from vendors such as tax identification information, government issued documents, such as licenses and creditworthiness data, among other information, as part of the application process.
- **Information Collected From Third Parties.** For example, from social media networks (such as LinkedIn, Facebook, Instagram, Twitter and Pinterest); and from ad networks (such as Google Analytics) to serve advertisements across the Internet. These advertisers use cookies, pixel tags, and other tracking technologies to collect information about your online activity and provide online behavioral advertising.

4. **HOW DO WE PROCESS PERSONAL DATA?**

a. **Operational Uses.** We process your personal data as part of our operations, which include:

- Providing or performing services or transactions that you have requested, including maintaining or servicing accounts, providing customer service, and verifying customer information;
- Managing your inquiries, responding to inquiries and requests via email, and communicating with you with regard to the Site;
- Communicating with you (not for marketing purposes) by email, text message (SMS, MMS), telephone or push notification about applications, payments or changes to your account information;
- Operating, maintaining, and improving the quality of the Services and such content, products and/or services as we may make available through the Services;
- Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us;
- Compliance with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies;
- Endeavoring to protect our and our partners’ rights, property, or safety, and the rights, property, and safety of our users and other third parties; and
- For other purposes, as permitted or required by law.

If the GDPR applies to the services we are providing you, we will only use your personal data if we have a proper reason, for example, (1) for the performance of a contract with you or to take steps at

your request before entering into a contract, (2) to comply with our legal and regulatory obligations, (3) for our legitimate interests or those of a third-party, or (4) where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

b. **Marketing Uses.** We may process your personal data as part of our marketing efforts when we have a legitimate interest in doing so. This means we may not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

- We may process your personal data to send messages, including text messages, to you about us, our partners, and the products and services we and our partners offer, which may from time to time include sweepstakes, contests, rewards, loyalty programs, events, promotions, new offerings, and special offers for products and services. Personal data you enter into incomplete or unsubmitted forms on the Services may be processed to send you reminders about completing the forms, as well as to save that information to make completing the forms easier.
- We also process personal data collected through social media platforms (such as LinkedIn, Facebook, Instagram, Twitter and Pinterest) and web tracking technologies to market to and understand our audience.
- We do not disclose personal data to third parties for their own direct marketing purposes.

You have the right to opt out of receiving marketing communications at any time, please see **Communications Opt-Out** below. We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

c. **Sharing of Personal Data.** Some of the above processing involves sharing collected personal data with third parties, including service providers and other third parties in the following circumstances:

- We may share your personal data with our affiliated or subsidiary companies who require access to your personal data for business purposes related to your tenancy or to process any application, request, inquiry, or other information or personal data you submit via the Site, and for our affiliates' own marketing purposes. This includes the owner of any community where you make an application or where you lease, as well as the management company for such community;
- We may share personal data with third parties who perform services on our behalf or on behalf of the owner of one of our properties. This includes, without limitation, third parties that send communications, process payments, analyze data, assist with utility billing or renters' insurance, provider utility services, provide insurance, provide guarantor services, provide credit checks, resident screening, or collection services, provide marketing assistance, provide customer service on our behalf, provide data storage and property management software services. These third parties may have access to your personal data in order to provide these services to us or on our behalf. These third parties may also receive,

or be given access to collect, Site Usage Information and other non-personal data for their own use;

- We may share personal data we collect in aggregated form, with certain business partners, such as agencies for analytics and reporting purposes, in order to provide us with information about the use of the Services and levels of engagement with the Services and to allow us to enter into new business relationships;
- We may share personal data to market and promote our, and our partners' products and offerings;
- We share personal data with third parties when we believe it is required by, or necessary to comply with, applicable law;
- We reserve the right to disclose and transfer your personal data in connection with a corporate merger, consolidation, restructuring, financing, sale of substantially all assets, or other corporate change, including for transaction due diligence. For instance, when a potential buyer is interested in purchasing one of our properties, we may provide the potential buyer with information about the property, the tenants who live there and any prospective tenants or applicants, which may include your personal data, or we may share your data where necessary with our financial lenders if necessary for the purpose of loan management; and
- We may share your personal data with our external auditors or our professional advisors.

We do not share your personal information with third parties for those third parties' (other than our affiliates) own direct marketing purposes without your consent. We may share non-personally identifiable information, such as Site Usage Information or other aggregated user statistics, with third parties without restriction.

Please note, we will only allow the organisations referred to above, to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

See the "***Your Choices***" section below for information about how you can make decisions about how we process personal data, including how to opt out of certain marketing communications.

5. PROTECTING YOUR PERSONAL DATA

We employ reasonable physical, technical, and organizational safeguards designed to promote the security of our systems and protect the confidentiality, integrity, availability, and resilience of personal data. However, no method of safeguarding information is completely secure. While we use measures designed to protect personal data, we cannot guarantee that our safeguards will be effective or sufficient. In addition, you should be aware that Internet data transmission is not always secure, and we cannot warrant that information you transmit utilizing the Services is or will be secure.

6. YOUR RIGHTS REGARDING PERSONAL DATA

You have a variety of legal rights regarding the collection and processing of personal data. You may exercise these rights, to the extent they apply to you, by contacting us as provided at the end of this Privacy Notice, or by

following instructions provided in this Privacy Notice or in communications sent to you. Please be prepared to provide reasonable information to identify yourself and authenticate your requests.

Note, however, that we may request certain reasonable additional information (that may include personal data) to help us authenticate the request and/or to clarify or understand the scope of such requests.

These rights vary depending on the particular laws of the jurisdiction applicable to you.

a. Accessing, Modifying, Rectifying, and Correcting Collected Personal Data.

We strive to maintain the accuracy of any personal data collected from you and will use commercially reasonable efforts to respond promptly to update our database when you tell us the information in our database is not accurate. However, we must rely upon you to ensure that the information you provide to us is complete, accurate, and up-to-date, and to inform us of any changes. Please review all of your information carefully before submitting it to us and notify us as soon as possible of any updates or corrections.

If you wish to access, review, or make changes to certain personal data you have provided to us through the Services, you may do so at any time through your account on the Services, at our locations, and/or by contacting us as provided below.

In accordance with applicable law, you may have the right to access or obtain from us certain personal data in our records by contacting us as provided at the end of this Privacy Policy. Please note, however, that we reserve the right to deny access as permitted or required by applicable law.

b. Your California Privacy Rights.

California's "Shine the Light" law permits our users who are California residents to request and obtain from us a list of what personal data (if any) we disclosed to third parties for their own direct marketing purposes in the previous calendar year and the names and addresses of those third parties. Requests may be made only once per year per person, must be sent to the email address below, and are free of charge. However, we do not disclose personal data protected under the "Shine the Light" law to third parties for their own direct marketing purposes. Requests may be sent through the contact methods listed below.

In addition, the California Consumer Privacy Act ("**CCPA**"), as amended by the California Privacy Rights Act ("**CPRA**") provides California residents with the below rights.

- **Right to Know/Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal data we have collected, used, disclosed, shared, and sold about you during the past 12 months.
- **Right to Data Portability:** You have the right to request a copy of personal data we have collected and maintained about you in the past 12 months.
- **Right to Correct:** You have the right to request that we correct the personal data we maintain about you if that information is inaccurate.
- **Right to Delete:** You have the right to request that we delete certain personal data we have collected from you.

- **Right to Opt-Out of Sale or Sharing:** You have the right to opt-out of the sale of your personal data or the sharing of your personal data for cross-context behavioral advertising purposes.
- **Right to Non-Discrimination:** You have the right not to receive discriminatory treatment by us for the exercise of your CCPA privacy rights.

Some of our Services, however, may require your personal data. If you choose not to provide your personal data that is necessary to provide any aspect of our Services, you may not be able to use those Services.

SALE OR SHARING OF PERSONAL DATA

We do not sell or share your personal data pursuant to the CCPA.

SUBMITTING A VERIFIED CCPA CONSUMER REQUEST

To exercise your rights, you must provide us with sufficient information to allow us to verify your identity and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. Once we receive the information you provide to us, we will review it and determine if more information is necessary to verify your identity as required by law, and we may request additional information in order to do so.

If you would like further information regarding your legal rights under California law or would like to exercise any of them, please contact us by emailing us at info@rockrose.com.

If any authorized agent submits a consumer request on your behalf, in order to confirm that person or entity's authority to act on your behalf and verify the authorized agent's identity, please email us at info@rockrose.com. We will also request additional information from the authorized agent to verify your authorization to request this information from an agent.

We will acknowledge receipt of the request within ten (10) business days of its receipt. We will respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For Data Portability requests, we will provide the responsive information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information 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.

c. Your Nevada Privacy Rights.

Nevada law permits our users who are Nevada consumers to request that their personal data not be sold (as defined under applicable Nevada law), even if their personal data is not currently being sold. Requests may be sent to the email address info@rockrose.com and are free of charge.

d. Your Virginia, Colorado, Connecticut, and Utah Rights

If you are located in Virginia, Colorado, Connecticut, and Utah, you have certain rights regarding your personal data. The section describes how we collect, use, and share your personal data under the Virginia Consumer Data Protection Act (“**VCDPA**”), the Colorado Privacy Act (“**CPA**”), the Connecticut Act Concerning Personal Data Privacy and Online Monitoring (“**PDPOM**”), and the Utah Consumer Privacy Act (“**UCPA**”) and your rights with respect to that personal data.

As a Virginia, Colorado, Connecticut, or Utah resident, you have some or all of the rights listed below. However, these rights are not absolute, and we may decline your request as permitted by law. You can ask to appeal any denial of your request in the same manner through which you may submit a request.

- **Right to Access and Portability:** You have the right to access your personal data and/or receive a copy of the personal data that we have collected about you.
- **Right to Correct:** You have the right to correct inaccurate personal data that we have collected about you.
- **Right to Delete:** You have the right to delete the personal data we have obtained about you or that you have provided to us with certain exceptions.
- **Right to Opt-out of Tracking for Targeted Advertising Purposes:** You have the right to opt-out of certain tracking activities for targeted advertising purposes.
- **Right to Opt-out of Profiling:** If we process your personal data for profiling purposes as defined by the VCDPA, CPA, PDPOM, and/or UCPA you can opt-out of such processing.
- **Right to Non-discrimination:** You have the right to be free from discrimination as prohibited by the VCDPA, CPA, PDPOM, and/or UCPA.

e. Your EU and UK Privacy Rights

The GDPR and other applicable data protection laws provide certain individuals with enhanced rights in respect of their personal data. These rights may include, depending on the circumstances surrounding the processing of personal data:

- **Right to Access to a copy of your personal data:** You have the right to be provided with a copy of your personal data.
- **Right to Correction (also known as rectification):** You have the right to require us to correct any mistakes in your personal data.
- **Right to Erasure (also known as the right to be forgotten):** You have the right to require us to delete your personal data, in certain situations.
- **Right to Restriction of use:** You have the right to require us to restrict use of your personal data in certain circumstances (e.g. if you contest the accuracy of the data).
- **Right to Data portability:** You have the right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third-party, in certain situations.

- **Right to object to use:** You have the right to object (i) at any time to your personal data being used for direct marketing (including profiling); and/or (ii) in certain other situations to our continued use of your personal data (e.g. where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims).
- **Not to be subject to decisions without human involvement:** You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. We do not make any such decisions based on data collected by our website.
- **The right to withdraw consents:** If you have provided us with a consent to use your personal data, you have a right to withdraw that consent easily at any time. Please contact us to do so. Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.

f. Your PIPL Rights

If you are resident in the People’s Republic of China (“**China**”, which, solely for the purposes herein, is exclusive of Taiwan, Hong Kong and Macau), the following rights may apply to you:

- **Right to Access:** You have the right to access personal data about you (commonly known as a “Data Subject Access Request”). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.
- **Right to Correction:** You have the right to correct any incomplete or inaccurate personal data we hold about you corrected.
- **Right to Objection:** You may have the right to object to us processing your personal data if we are not entitled to use it anymore.
- **Right to Withdrawal of consent:** Where we process your personal data on the legal basis of the consent from you, you have the right to withdraw your consent at any time by contacting us via the email below (note: withdrawal of consent does not affect the validity of our consent-based personal data processing prior to the withdrawal).
- **Right to Erasure:** You may have the right to delete your personal data if we are keeping it too long.
- **Right to Portability:** You have the right to request personal data provided by you to be transferred in an electronic format.
- **Right to Portability:** You have the right to have the processing of your personal data restricted in certain circumstances.
- **Right to Restrict:** You have the right to restrict the processing of your personal data.
- **Right to Lodge a Complaint:** You have the right to make a complaint with a data protection authority.

7. YOUR CHOICES

You have the ability to make certain choices about how we communicate with you, and how we process certain personal data.

- a. ***Communications Opt-Out.*** You may opt-out of receiving marketing or other communications from us at any time by following the opt-out link or other unsubscribe instructions provided in any email message received or by contacting us as provided at the end of this Privacy Notice. If you wish to opt out by sending us an email to the address provided below, please include “Opt-Out” in the email’s subject line and include your name and the email address you used to sign up for communications in the body of the email.
- b. ***Location Information.*** If you want to limit or prevent our ability to receive location information from you, you can deny or remove the permission for certain Services to access location information or deactivate location services on your device. Please refer to your device manufacturer or operating system instructions for instructions on how to do this.
- c. ***Cookies, Web Tracking, and Advertising.*** To learn more about the cookies we use, please visit our Cookie Policy below.

8. RETENTION OF PERSONAL DATA

We retain personal data for no longer than we deem necessary to provide the Services and to carry out the processing activities described above, including but not limited to compliance with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, and to the extent we reasonably deem necessary to protect our and our partners’ rights, property, or safety, and the rights, property, and safety of our users and other third parties.

Your personal data will not be kept in a form that allows you to be identified for any longer than we reasonably consider necessary for the purposes for which it was collected or processed, or as permitted or required by applicable laws related to data retention. The retention period for your personal data is determined based on the purpose of processing of the particular information.

Thereafter, as a general matter, your personal data will be archived and stored to be used and otherwise processed in the event of legal or regulatory requirements, statutes of limitations, disputes, or actions, and will be stored and, if applicable, used and otherwise processed until reasonably after the end of any such requirement, limitation, dispute, or action, including any potential periods of review or appeal.

Following the end of the of the relevant retention period, we will delete or anonymise your personal information, or archived as permitted by applicable law.

9. OTHER IMPORTANT INFORMATION ABOUT PERSONAL DATA AND THE SERVICES.

- a. ***Collection of Personal Data from Children.*** Children under 16 years of age are not permitted to use the Services, and we do not knowingly collect information from children under the age of 16. By using the Services, you represent that you are 18 years of age or older or are 16 years of age or older and have valid guardian or parental consent to do so. In the event that we become aware that we have collected personal information from any child, we will dispose of that information. If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with personal information, please contact us at info@rockrose.com.

- b. **Third-Party Websites and Services.** As a convenience, we may reference or provide links to third-party websites and services. When you access these third-party services, you leave our Services, and we are not responsible for, and do not control, the content, security, or privacy practices employed by any third-party websites and services. You access these third-party services at your own risk. This Privacy Notice does not apply to any third-party services; please refer to the privacy notice or policies for such third-party services for information about how they collect, use, and process personal data.
- c. **Business Transfer.** We may, in the future, sell or otherwise transfer some or all of our business, operations or assets to a third party, whether by merger, acquisition or otherwise. Personal data we obtain from or about you via the Services may be disclosed to any potential or actual third-party acquirers and may be among those assets transferred.
- d. **Equal Employment Opportunity Reporting.** In conjunction with laws and regulations enforced by the Equal Employment Opportunity Commission (“EEOC”), the Office of Federal Contract Compliance Programs (“OFCCP”) and similar state and local regulatory agencies, we may ask you to provide us with self-identifying information (such as veteran status, gender and ethnicity). Providing such self-identifying information is voluntary, but if you do provide us with such information, we may submit that information, to the EEOC, the OFCCP and similar state and local regulatory agencies or otherwise use or disclose it for business-related purposes, including, without limitation, responding to information requests, fulfilling regulatory reporting requirements and defending against employment related complaints.
- e. **Sweepstakes and Promotions.** If you choose to enter a sweepstakes, contest or other promotion, your personal information may be disclosed to third parties in connection with the administration of such promotion, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law, such as on a winners list. Also, by entering a promotion, you are agreeing to the official rules that govern that promotion, which may contain specific requirements of you, including, except where prohibited by law, allowing the sponsor(s) of the promotion to use your name, voice and/or likeness in advertising or marketing associated with the promotion. If you are not happy for your data to be used in this way, please do not continue with your entry.
- f. **Payment Information.** Payments made by users are processed by our third party payment provider and are subject to their privacy policy and terms of service.
- g. **Do Not Track.** We use analytics systems and providers that process personal data about your online activities over time and across third-party websites or online services, and these systems and providers may provide some of this information to us. You may exercise your choice regarding the use of cookies and other tracking technologies by visiting the links below and/or modifying the settings of your web browsers across the devices you use.
- <https://tools.google.com/dlpage/gaoptout> Google Analytics
 - <http://www.adobe.com/privacy/opt-out.html> Adobe Analytics
 - <https://www.facebook.com/help/2207256696182627/> – Facebook Analytics
 - <https://adssettings.google.com/u/0/authenticated> – Google Ads Preferences
 - <https://www.facebook.com/ads/preferences/edit/> – Facebook Ads Preferences
 - <https://account.microsoft.com/privacy/ad-settings> – Bing Ads Preferences
 - <http://optout.aboutads.info/> – General Cookie Opt Out Tool
 - <https://help.twitter.com/en/safety-and-security/privacy-controls-for-tailored-ads> – Twitter
 - <https://www.linkedin.com/help/linkedin/answer/90274/manage-your-linkedin-ads-settings?lang=en> – LinkedIn

- <https://help.pinterest.com/en/article/personalization-and-data> – Pinterest
- Major Web Browsers:
 - Chrome – <https://support.google.com/chrome/answer/95647>
 - Microsoft Edge – <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>
 - Firefox – <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
 - Safari on Mac- <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
 - Safari Mobile Devices – <https://support.apple.com/en-us/HT201265>

h. **International Use.** Rockrose is headquartered and operates in the United States, therefore your personal data will be stored and processed in the United States. If you are using the Services from outside the United States, by your use of the Services you acknowledge that we will transfer your data to, and store your personal data in, the United States, which may have different data protection rules than in your country, and personal data may become accessible as permitted by law in the United States, including to law enforcement and/or national security authorities in the United States.

If you are based in the UK or EEA, we will only transfer your personal data in accordance with data protection laws and we only transfer your personal data to a country outside the UK/EEA where:

- in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal information (known as an ‘adequacy decision’). A list of countries the UK currently has adequacy regulations in relation to is available [here](#);
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal information (known as an ‘adequacy decision’). A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#);
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you. This will most likely be that we have put in place the appropriate standard contractual clauses and carried out a transfer impact assessment; or
- a specific exception applies under relevant data protection law.

If you are based in China, we may transfer your personal data outside of China to our office located in the U.S., and we will ensure the recipient is bound by applicable laws in its jurisdiction to provide a standard of protection for your personal data that is equivalent to that under this Privacy Notice.

10. **MODIFICATIONS AND UPDATES TO THIS PRIVACY NOTICE**

This Privacy Notice replaces all previous disclosures we may have provided to you about our information practices with respect to the Services. We reserve the right, at any time, to modify, alter, and/or update this Privacy Notice, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Notice. Your continued use of the Services following our posting of any revised Privacy Notice will constitute your acknowledgement of the amended Privacy Notice. When we make significant changes, we will take steps to inform you, for example via emailing you a copy of the updated privacy notice.

11. APPLICABILITY OF THIS PRIVACY NOTICE

This Privacy Notice is subject to any agreements that govern your use of the Services. This Privacy Notice applies regardless of the means used to access or provide information through the Services.

This Privacy Notice does not apply to information from or about you collected by any third-party services, applications, or advertisements associated with, or websites linked from, the Services. The collection or receipt of your information by such third parties is subject to their own privacy policies, statements, and practices, and under no circumstances are we responsible or liable for any third party's compliance therewith.

12. ADDITIONAL INFORMATION

If you have any questions or concerns about this Privacy Notice and/or how we process personal data, please contact us at:

Rockrose Development L.L.C.
Attn: Privacy
15 East 26th Street, 7th Floor
New York, NY 10010
info@rockrose.com
1-212-847-3700

If you are located in the United Kingdom, European Union or European Economic Area, and you wish to raise a concern regarding our use of your personal data, you have the right to do so with your lead supervisory authority https://edpb.europa.eu/about-edpb/about-edpb/members_en or your local supervisory authority.

For more information about how users with disabilities can access this Privacy Notice in an alternative format, please contact us through the above contact methods.

Effective: June, 2024

ROCKROSE COOKIE POLICY

WHAT ARE COOKIES AND PIXEL TAGS?

Cookies are small text files which is placed onto your device (e.g. computer, smartphone or other electronic device) that allows us, ad networks, and our third-party service providers, to identify your browser and/or device as you browse the Internet. Cookies can be placed, read, and/or written to by our Services, or other websites or services that recognize a particular cookie, which allows the website to “remember” or “recognize” a particular browser or device and, in some cases, store information about that browser or device.

Cookies are often used in conjunction with “pixel tags” (also known as “web beacons” or “clear gifs”). Pixel tags are small images that we, our analytics providers, advertisers, and other third parties can use to interact with cookies and other tracking technologies.

For more information about cookies, please see www.allaboutcookies.org.

CONSENT TO USE COOKIES AND CHANGING SETTINGS

We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested (e.g. to remember your cookie preferences).

You can withdraw any consent to the use of cookies or manage any other cookie preferences by updating your browser settings. It may be necessary to refresh the page for the updated settings to take effect.

HOW LONG ARE COOKIES STORED ON MY SYSTEM?

Session Cookies. “Session cookies” are stored for the duration of a browser session; when you close the browser, the cookie is deleted.

Persistent Cookies. “Persistent cookies” are stored for a preset amount of time (often between 90 days and two years, depending on the application) and are typically not deleted when a browser session is closed.

Your choices may affect whether we use session or persistent cookies for a particular application.

WHAT COOKIES DO WE USE, AND WHY?

Necessary Cookies. Some cookies are necessary to allow you to browse the Services and access certain pages. Necessary cookies are required for the Services (or certain functionality on the Services) to work properly, and we do not use these cookies to collect personal data about you. Disabling or removing these cookies may prevent the Services, or certain functionality on the Services, from working correctly or at all.

Performance Cookies. We use performance cookies to collect information about how our users use and interact with the Services, such as what pages are visited most often, how the Services are used and function, or how users navigate the Services. We use this information to improve the Services and their content. Disabling or removing these cookies generally does not interfere with the functionality or performance of the Services.

Functionality Cookies. We use functionality cookies to remember information that you have provided or choices you have made on the Services, such as saving your logged-in status, site preferences, or the contents of your shopping cart. This allows us to provide a more personalized and convenient browsing experience. Disabling or

removing these cookies may make browsing the Services less convenient or may prevent certain functionality from working correctly.

Targeting, Advertising or Third Party Cookies. We may allow third party advertisers, including advertising providers and ad networks, to place and/or activate cookies, pixel tags, and/or other tracking technologies designed to enable advertising on your device and deliver it to you across the Internet. Disabling or removing these cookies, resetting your advertising identifier, or opting out of online behavioral advertising altogether (as applicable) may result in advertising that is repetitive or less relevant to you.

OUR USE OF COOKIES.

The table below provides more information about the cookies we use:

Cookie Name	Type	More Information
wordpress_sec_	Necessary	This cookie is essential for WordPress security features that help protect the website by ensuring that user data remains private and preventing unauthorized access.
availabilities_order	Functionality	This is used to restore the user's view when they return to the page or continue their session, enhancing user experience by keeping their preferences intact.
url_location	Functionality	Captures and stores the URL of the current page when the user saves their preferred order of apartment listings. This is used to return the user to the same page state when they revisit.
wp-settings-17	Functionality	These cookies are used to customize your view of the admin interface of WordPress.
wp-settings-time-17	Functionality	These cookies track the exact time when the wp-settings-17 cookie was set.
_ga	Performance / Third Party	This cookie helps collect data on how visitors use the website, which is used to compile reports and improve the site.
ga[ID]	Performance / Third Party	This cookie helps collect data on how visitors use the website, which is used to compile reports and improve the site.
_gcl_au	Third Party	Used by Google Ads for experimenting with advertisement efficiency across websites using their services. It is used to track conversions that are linked to ad clicks.

THIRD-PARTY FUNCTIONALITY

We do not have access to or control over cookies or other features that advertisers and third-party sites may use, and the information practices of those advertisers and third-party websites are not covered by our Privacy Notice or this Cookie Notice.

We do not control how those platforms collect information about you, nor whether or how they may track you or may activate their own cookies on your computer.

To opt out of many online behavioral advertising mechanisms, including Facebook, Google, and others, you can use the Network Advertising Initiative's Consumer Opt-Out service and/or the Digital Advertising Alliance's Consumer Choice Tool. If you would like to opt out of Google Analytics, and certain Google advertising functionality, you may do so using Google's opt-out tool.

For more information about how third parties collect and use information about your activities, please review their applicable Terms of Use and Privacy Policies.

HOW DO I CONTROL OR MAKE CHOICES ABOUT COOKIES AND TRACKING TECHNOLOGIES?

Managing Cookies in the UK and EU. We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested, please see the '*Necessary Cookies*' in the table above.

You can withdraw any consent to the use of cookies or manage any other cookie preferences by updating your browser settings.

Please note, if you do not want to accept cookies, you may lose some functionality of our website.

Managing Cookies in the U.S.A. Most browsers automatically accept cookies by default, but you can adjust your device and/or browser settings to delete and/or block some or all cookies or provide notifications when you receive a new cookie. Consult the "Help," "Tools," or "Preferences" menus on your browser, or the documentation for your device, for more information about how to do this. Please note, however, that blocking or deleting certain cookies may negatively affect your user experience.

Advertising. Certain devices and browsers allow you to reset your advertising identifier at any time by accessing the privacy settings on your device in order to restrict the delivery of tailored in-application advertisements. Consult your device's documentation for more information about how to do this.

ADDITIONAL INFORMATION AND ASSISTANCE

If you have any questions or concerns about this Cookie Notice and/or how we process personal data, please contact us at info@rockrose.com. For detailed information about your rights in relation to your personal information and details of how to contact us and supervisory authorities if you have a complaint, please refer to our Privacy Notice.