

PRIVACY POLICY

February 13, 2025

This Privacy Notice for TriStar Rental Properties LLC ("we," "us," or "our"), describes how and why we might access, collect, store, use, and/or share ("process") your personal information when you use our services ("Services"), including when you:

- Visit our website at www.TriStarPropertyMgmt.com, or any website of ours that links to this Privacy Notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@tristarpropertymgmt.com.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? Some of the information may be considered "special" or "sensitive" in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We never request this information.

Do we collect any information from third parties? We may collect information from public databases, marketing partners, social media platforms, and other outside sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties.

How do we keep your information safe? We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by visiting www.TriStarPropertyMgmt.com, or by contacting us at **(719) 284-2444**. We will consider and act upon any request in accordance with applicable data protection laws.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- mailing addresses
- job titles
- contact preferences
- contact or authentication data

Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- financial data
- credit worthiness data
- social security numbers or other government identifiers

Payment Data. We may collect data necessary to process your payment if you choose to make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is handled and stored by us.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

We do not collect information through cookies and similar technologies.

The information that cookies and similar technologies can often collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **Location Data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected from other sources

In Short: We may collect limited data from public databases, marketing partners, and other outside sources.

In order to enhance our ability to provide relevant marketing, offers, and Services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or

user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To send you marketing and promotional communications. We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. To comply with our legal obligations. We may process your information to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.
- To provide Services to you. For the performance of our contract with you or to take steps at your request before entering into a contract.
- To prevent and detect fraud against you or us. For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you.
- Conducting checks to identify our customers and verify their identity. Screening for financial and other sanctions or embargoes. Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business, e.g., under health and safety regulation or rules issued by our professional regulator. To comply with our legal and regulatory obligations.
- Gathering and providing information required by or relating to audits, inquiries, or investigations by regulatory bodies. To comply with our legal and regulatory obligations.
- Ensuring business policies are adhered to, e.g., policies covering security and internet use. For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you.
- Operational reasons, such as improving efficiency, training, and quality control. For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price.

- Ensuring the confidentiality of commercially sensitive information. For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information, and to comply with our legal and regulatory obligations.
- Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product range or other efficiency measures. For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price.
- Preventing unauthorized access and modifications to systems. For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you, and to comply with our legal and regulatory obligations.
- Updating and enhancing customer records. For the performance of our contract with you or to take steps at your request before entering into a contract, and to comply with our legal and regulatory obligations. For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products.
- Statutory returns. To comply with our legal and regulatory obligations
- Ensuring safe working practices, staff administration and assessments, and to comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.
- Marketing our Services and those of selected third parties to: 1) Existing and former customers, 2) Third parties who have previously expressed an interest in our Services, and 3) Third parties with whom we have had no previous dealings. For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers.
- Credit reference checks via external credit reference agencies. For our legitimate interests or those of a third party, i.e., to ensure our customers are likely to be able to pay for our products and Services.
- External audits and quality checks, e.g., for ISO or Investors in People accreditation and the audit of our accounts. For our legitimate interests or a those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards, and to comply with our legal and regulatory obligations.

3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("third parties") who perform Services for us or on our behalf and require access to such information to do that work.

The third parties we may share personal information with are as follows:

- Buildium
- TransUnion
- Tenant Turner

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Notice. Affiliates include a parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We do not use cookies and other tracking technologies to collect and store your information.

5. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

In Short: We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, "AI Products"). These tools are designed to enhance your experience and provide you with innovative solutions. The terms in this Privacy Notice govern your use of the AI Products within our Services.

Our AI Products

Our AI Products are designed for the following functions:

- AI automation
- AI bots

How We Process Your Data Using AI

All personal information processed using our AI Products is handled in line with our Privacy Notice and our agreement with third parties. This ensures high security and safeguards your personal information throughout the process, giving you peace of mind about your data's safety.

We do not use AI to make consequential decisions regarding your permission to use our Services, i.e., approving or denying a rental application.

6. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

8. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to minors.

We do not market our products or Services to persons under 18 years of age and do not wish to collect personal information from minors.

9. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us at info@tristarpropertygmt.com.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying "STOP" or "UNSUBSCRIBE" to the SMS messages that we send, or by contacting us at **Insert Website Link for Web Inquiry or Email Address.** You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or Services of our Services.

If you have questions or comments about your privacy rights, you may email us at info@tristarpropertymgmt.com.

10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications 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. At this stage, 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 Notice.

California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.

11. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of,

or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.

Categories of Personal Information We Collect

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	YES
D. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	YES
G. Geolocation data	Device location	

		NO
H. Audio, electronic, sensory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	YES
J. Education Information	Student records and directory information	NO
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO
L. Sensitive personal Information	Drivers' licenses, financial information including account access details, passport numbers, social security numbers and state id card numbers	YES

We only collect sensitive personal information, as defined by applicable privacy laws or the purposes allowed by law or with your consent. Sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You may have the right to limit the use or disclosure of your sensitive personal information. We do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;

- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A - As long as the user has an account with us
- Category B - As long as the user has an account with us
- Category C - As long as the user has an account with us
- Category F - As long as the user has an account with us
- Category H - As long as the user has an account with us
- Category I - As long as the user has an account with us
- Category L - As long as the user has an account with us

How We Use and Share Personal Information

Your personal information may be used in profiling and automated processes that could produce legal or similarly significant effects for you.

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information.

We have not sold or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We have disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

- Category A. Identifiers
- Category B. Personal information as defined in the California Customer Records law
- Category C. Characteristics of protected classifications under state or federal law
- Category F. Internet or other electronic network activity information
- Category I. Professional or employment-related information
- Category L. Sensitive personal information

Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- **Right to know whether or not we are processing your personal data**
- **Right to access your personal data**
- **Right to correct inaccuracies in your personal data**
- **Right to request the deletion of your personal data**
- **Right to obtain a copy of the personal data you previously shared with us**
- **Right to non-discrimination for exercising your rights**
- **Right to opt out of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")**

Depending upon the state where you live, you may also have the following rights:

- **Right to access the categories of personal data being processed (as permitted by applicable law, including Minnesota's privacy law)**
- **Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including California's and Delaware's privacy law)**
- **Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including Minnesota's and Oregon's privacy law)**
- **Right to review, understand, question, and correct how personal data has been profiled (as permitted by applicable law, including Minnesota's privacy law)**
- **Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including California's privacy law)**
- **Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including Florida's privacy law)**

How to Exercise Your Rights

To exercise these rights, you can contact us by visiting <https://tristarpropertymgmt.com>, by emailing us at info@tristarpropertymgmt.com, by calling us at (719) 284-2444, or by mailing to TriStar Rental Properties LLC 6760 Corporate Dr, Colorado Springs CO 80919.

We will honor your opt-out preferences if you enact the Global Privacy Control (GPC) opt-out signal on your browser.

Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at Insert Email Address. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

California "Shine The Light" Law

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 via email at Insert Email Address.

12. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated "Revised" date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly

sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@tristarpropertymgmt.com or contact us by post at:

TriStar Rental Properties LLC

Company Address

6760 Corporate Drive, Colorado Springs Colorado 80919, United States