

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 America, the “Hometown Parties”). California residents should refer to our California Privacy Policy, which can be found on the Hometown America website at <https://www.hometownamerica.com/Privacy-Policy> by clicking “View Privacy Policy for CA.”

Effective date: January 1, 2025

Hometown America (also referred to herein as “Company,” “us,” “we,” or “our”) operates the <https://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”). This Privacy Policy applies both to our residents and 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 (defined below). 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. Please note that Hometown America’s practices may differ from those specific to our California residents, consumers, affiliates, and employees (“Hometown California”), and such differences will be pointed out where applicable.

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).
- **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 carryout 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 Services to you.

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

Category A Identifiers	Identifiers, such as 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 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, or employment history.
Hometown America collected Personal Information in the form of Category B in the past 12 months.	
Category C Characteristics	Characteristics of protected classifications under 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 collected 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 collected 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, behaviors, 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 an online form, (b) by calling the phone numbers on our Website, (c) by filling out our Residency Application, (d) by providing your information to a sales lead business partner, and by opting into receiving SMS or text messages. 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 carry out 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

Hometown America 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 allow you to participate in a voluntary activity, only when consent is obtained, related to information collected by Hometown America (e.g., allow your information to be passed to a third party for participation in a market study);
- 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 this communication from us by reaching out to us using the contact information provided in Section XII below.

VI. Retention of Data

Hometown America may sell your information if written consent is obtained from you. If Hometown America were to begin selling your information to any third party, it would not do so without your express written permission and will not sell the Personal Information of anyone under age 16 without applicable consent. Hometown America may disclose your information in a number of ways in order to provide our Services to you. Hometown America will not share SMS consent and phone numbers with third parties or affiliates for marketing purposes and will only share such information if required by law.

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), UKG (for employees), and others (collectively, "Service Providers"). 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 Service Providers 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.
- **Market Studies:** Hometown America, excluding Hometown California, may seek residents' consent to share personal information with a third party for the purposes of a market study. Only if a resident agrees in writing will Hometown America share personal information with a third party for the purposes of a market study.

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.
- Resident information from Categories A, B, H and I for the purposes described in Service Providers above.
- Employee and resident information from Categories A, B, D, and I for the purposes described in Lenders above.
- Hometown America, excluding Hometown California, may disclose resident information from Categories A, B and C for the purposes described in Market Studies above.

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.

VII. 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.

VIII. Analytics

We may use 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 [Facebook Custom Audiences](#) to learn more. 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: [Facebook's Privacy Policy](#). For more information on Facebook's use of cookies, please visit: [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?"

IX. 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.

X. 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.

XI. Consumer Data Protection/Privacy Policy Coordinator

Hometown America has delegated to its Senior 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.

XII. 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, 110 N. Wacker Dr., Suite 4500, 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 1-877-763-7543 and request that our Chief Privacy Officer contact you.

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

BRD Development, L.L.C.	Hometown Landmark, L.L.C.
BRD Holding, L.L.C.	Hometown Ledgewood, L.L.C.
CWS Communities LP	Hometown Leisurewoods, L.L.C.
Del Tura Phase I, LLC	Hometown Leisurewoods Taunton, L.L.C.
Del Tura Phase II, LLC	Hometown Liberty Village, L.L.C.
Euromerican Investment Group, Ltd.	Hometown Little Manatee, L.L.C.
Fairways	Hometown LP Australia, L.L.C.
Fairways Country Club, Inc.	Hometown Maple Valley, L.L.C.
Fairways SPE LLC	Hometown Mays Landing MHC, L.L.C.
GTS Development, L.L.C.	Hometown Oak Point I, L.L.C.
GTS Development II, L.L.C.	Hometown Oak Point II, L.L.C.
Hometown Alden Place, L.L.C.	Hometown Oakhill, L.L.C.
Hometown America Communities, Inc.	Hometown Oaks of Weymouth, L.L.C.
Hometown America Foundation	Hometown Origen Investment I, L.L.C.
Hometown America Holdings, L.L.C.	Hometown Palm Valley, L.L.C.
Hometown America Insurance Services, L.L.C.*	Hometown Pine Lakes MHC, L.L.C.
Hometown America Management Corp.*	Hometown Pine & Pond, L.L.C.
Hometown America Management, L.L.C.	Hometown Pine & Pond Storage, L.L.C.
Hometown America Management, L.P.*	Hometown Pinelake Gardens, L.L.C.
Hometown America, L.L.C.	Hometown Rehoboth, L.L.C.
Hometown Angola Beach, L.L.C.	Hometown Residential Manager, L.L.C.
Hometown Angola Land, L.L.C.	Hometown Saddlebrook, L.L.C.
Hometown Arbor Gate, L.L.C.	Hometown Saddlebrook Services, L.L.C.
Hometown Audubon, L.L.C.	Hometown Southern Pines, L.L.C.
Hometown Australia Limited Partnership	Hometown Sunny South, L.L.C.
Hometown Barclay Farms, L.L.C.	Hometown Thurms Estates, L.L.C.
Hometown Berryman’s Branch, L.L.C.	Hometown University Lakes, L.L.C.
Hometown Brighton at Barnegat, LLC	Hometown VCB Land, L.L.C.
Hometown Clearwater Village, L.L.C.	Hometown Village of Cool Branch, L.L.C.
Hometown Communities Limited Partnership*	Hometown Westwood Estates, L.L.C.
Hometown Communities, LLC*	Leisurewoods Land, L.L.C.
Hometown Countryview, L.L.C.	MH Financial Services, L.L.C.*
Hometown Crescent Run, L.L.C.	Miller’s Woods MHC, L.L.C.
Hometown CVI Holdings, L.L.C.*	Mullica Woods MHC, L.L.C.
Hometown CVI Venture, L.L.C.	River Bend MHC, L.L.C.
Hometown Foxwood Village, L.L.C.	Saddlebrook 60, L.L.C.
Hometown Glenwood Village, L.L.C.	Saddlebrook Phase 8, L.L.C.
Hometown Homes Realty MA, L.L.C.	Second Merger Sub, LLC
Hometown Homes Realty PA, L.L.C.	Sun Coast Investment Group Limited
Hometown Insurance Investment I, L.L.C.	Tanglewood MHC, L.L.C.
Hometown Lakes at Leesburg, L.L.C.	Tara Woods SPE LLC
Hometown Lakes of Melbourne, L.L.C.	

Entities marked with an asterisk () operate, or own interests in entities that operate within and outside of California. The California Privacy Policy is applicable to California residents, consumers, affiliates, and employees of these entities. The Consumer Data Protection/Privacy Policy applies to residents, consumers, affiliates, and employees of these entities outside of California.