

Effective Date: June 30, 2020

Combined Properties, Incorporated (“**CPI**”) has a long-standing commitment to safeguarding the privacy of information entrusted to us. The privacy principles and procedures set forth below (“**Privacy Policy**”) are intended to tell you how we may collect, use, and disclose information. This Privacy Policy applies to all Personal Information (defined below) that CPI collects, both online and offline. We collect data about users of **www.combined.biz** and any other websites, blogs, mobile sites, applications, and other interactive features operated now and in the future by or for CPI (collectively the “**Website**”); about anyone who expresses an interest in CPI or with whom CPI carries on business (and these individuals about whom CPI collects data are referred to as “**you**” and “**your**” in this Privacy Policy).

By accessing or using our Website, you signify that you agree with all of the terms of this Privacy Policy and the **Terms of Use**. If you do not agree to the Privacy Policy and Terms of Use, you must not access or use the Website. We may change this Privacy Policy at any time. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Website. By accessing or using the Website following any such changes, you signify that you accept the revised Privacy Policy.

INFORMATION COLLECTED

We collect several types of information, including information:

- that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“**Personal Information**”);
- That is about you but individually does not identify you (see Other Information We May Collect); and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

The information we collect is obtained from the following categories of sources:

- Directly from You – We may collect information you provide to us, or that you authorize a third party to provide to us, including when you communicate with us by phone, e-mail or in person; and when you apply for a job or otherwise communicate with us.
- Indirectly from You – We may use data collection technologies to collect information about you (see Automatic Data Collection Technologies below)

We may use the Personal Information we have collected for business purposes including those business purposes identified below. **CPI does not sell Personal Information. CPI does not share your Personal Information with unaffiliated third parties for promotional or advertising purposes.** Except as provided below, we do not disclose your personal information to third parties. When we disclose Personal Information for a business purpose without your express consent, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

Within the last twelve (12) months, we have collected the following categories of Personal Information:

Type of Personal Information Collected	Source of Collection	Business Purpose for Collection and Use	Business Purpose for Third-Party Disclosure
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<p>A. Identifiers. A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Directly from You • Indirectly from You 	<ul style="list-style-type: none"> • To engage your services or enter into a business relationship with you. • To manage and administer your or your organization's relationship with us, including billing and collection, marketing and support services, and taking other steps linked to the performance of our business relationship. • To carry out our obligations and enforce our rights arising from any contracts entered into between you and us. • For insurance purposes. • To evaluate an application or service agreement. • In connection with employment, employment benefits, or prospective employment. 	<ul style="list-style-type: none"> • Contractors or service providers we have retained in connection with the services we provide. • Other third parties at your direction or with your consent, or in furtherance of any matters on which we are providing services. • Financing • Tenant insurance compliance • Real Estate Tax consulting (valuations and appeal opportunities) • Tenant reimbursements and utilities billing services • Legal counsel (lease negotiations and lease enforcement & litigation)
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<p>B. Personal Information Categories Listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p> <p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information,</p>	<ul style="list-style-type: none"> • Directly from You 	<ul style="list-style-type: none"> • To engage your services or enter into a business relationship with you. • To manage and administer your or your organization's relationship with us, including billing and collection, marketing and support services, and taking other steps linked to the performance of our business relationship. • To carry out our obligations and enforce our rights arising from any contracts entered into between you and us. • For insurance purposes. • To evaluate an application or service agreement. • In connection with employment, employment benefits, or prospective employment. 	<ul style="list-style-type: none"> • Contractors or service providers we have retained in connection with the services we provide. • Other third parties at your direction or with your consent, or in furtherance of any matters on which we are providing services. • Financing • Tenant insurance compliance • Real Estate Tax consulting (valuations and appeal opportunities) • Tenant reimbursements and utilities billing services • Legal counsel (lease negotiations and lease enforcement & litigation)
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<p>C. Protected classification characteristics under California or federal law.</p> <p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<ul style="list-style-type: none"> • Directly from You 	<ul style="list-style-type: none"> • To engage your services or enter into a business relationship with you. • To manage and administer your or your organization's relationship with us, including billing and collection, marketing and support services, and taking other steps linked to the performance of our business relationship. • To carry out our obligations and enforce our rights arising from any contracts entered into between you and us. • For insurance purposes. • To evaluate an application or service agreement. • In connection with employment or employment benefits. 	<ul style="list-style-type: none"> • Contractors or service providers we have retained in connection with the services we provide. • Other third parties at your direction or with your consent, or in furtherance of any matters on which we are providing services. • Financing • Tenant insurance compliance • Real Estate Tax consulting (valuations and appeal opportunities) • Tenant reimbursements and utilities billing services • Legal counsel (lease negotiations and lease enforcement & litigation)
<p>D. Commercial information.</p> <p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • To enter into a contractual relationship with you. 	<ul style="list-style-type: none"> • Contractors or service providers we have retained in connection with the services we provide. • Other third parties at your direction or with your consent, or in furtherance of any matters on which we are providing services. • Financing • Tenant insurance compliance • Real Estate Tax consulting (valuations and

			<p>appeal opportunities)</p> <ul style="list-style-type: none"> • Tenant reimbursements and utilities billing services • Legal counsel (lease negotiations and lease enforcement & litigation)
<p>E. Professional or employment-related information.</p>	<ul style="list-style-type: none"> • Directly from You 	<ul style="list-style-type: none"> • To enter into a contractual relationship with you. • To manage and administer your or your organization's relationship with us, including billing and collection, marketing and support services, and taking other steps linked to the performance of our business relationship. • To carry out our obligations and enforce our rights arising from any contracts entered into between you and us. • For insurance purposes. • To evaluate an application. • In connection with employment, employment benefits, or prospective employment. 	<ul style="list-style-type: none"> • Contractors or service providers we have retained in connection with the services we provide. • Other third parties at your direction or with your consent, or in furtherance of any matters on which we are providing services. • For any other permitted reasons in connection with your employment at CPI
<p>F. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</p> <p>Education records directly related to a student maintained by an educational institution or</p>	<ul style="list-style-type: none"> • Directly from You 	<ul style="list-style-type: none"> • To enter into a contractual relationship with you. • To manage and administer your or your organization's relationship with us, including billing and collection, marketing 	<ul style="list-style-type: none"> • Contractors or service providers we have retained in connection with the services we provide. • Other third parties at your direction or with your consent, or in furtherance of any

<p>party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>		<p>and support services, and taking other steps linked to the performance of our business relationship.</p> <ul style="list-style-type: none"> • To carry out our obligations and enforce our rights arising from any contracts entered into between you and us. • For insurance purposes. • To evaluate an application. • In connection with employment, employment benefits, or prospective employment. 	<p>matters on which we are providing services.</p> <ul style="list-style-type: none"> • For any other permitted reasons in connection with your employment at CPI
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OTHER INFORMATION WE COLLECT

Our website and online resources also collect other basic information about you that does not directly identify you, but which may correspond with you or a particular device (“**Other Information**”). We use this information to learn more about how our Website operates. We also use this information to customize the way information on our Website is presented to you. This information includes the IP address of your device; information regarding the pages on our Website that you have visited; time you spent on our Website; date and time of your visits; information about your web browser, device, and operating system; and location of the website visited just before our Website.

HOW WE MAY USE AND DISCLOSE OTHER INFORMATION

Please note that we may use and disclose Other Information for any purpose, except where we are required to treat Other Information as Personal Information under applicable law. In those situations, we may use and disclose Other Information for the purposes for which we use and disclose Personal Information.

In some instances, we may combine Other Information with Personal Information (such as combining your name with your company and title). If we combine any Other Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is so combined.

YOUR CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

You have certain choices about your Personal Information. Where you have consented to the processing of your personal information, you may withdraw that consent at any time and prevent further processing by contacting us as described below. Even if you opt out, we may still collect and use Other Information that is not Personal Information for other purposes as described above.

ADDITIONAL PRIVACY RIGHTS

If you are a resident of California or any state with similar laws, you may be covered by the California Consumer Privacy Act (“**CCPA**”; California Civil Code sections 1798.100 *et seq.*) or the similar laws of other states and may have the following additional rights regarding our use of your Personal Information:

ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS

You have the right to request that CPI disclose the following information about our data collection: (a) the categories of Personal Information we have collected about you; (b) the specific pieces of Personal Information we have collected about you; (c) the categories of sources from which your Personal Information was collected; (d) the categories of third parties with whom we share your Personal Information; and (e) the business or commercial purpose for collecting or disclosing your Personal Information. You may make a request for this information no more than twice in a twelve (12) month period. Please see Exercising Access, Data Portability, and Deletion Rights for information about how we verify your request.

DELETION REQUEST RIGHTS

You have the right to request that CPI delete any of your Personal Information that we have collected from you and retained, subject to certain exceptions (“**Deletion Request**”). Please see *Exercising Access, Data Portability, and Deletion Rights* for information about to we verify your Deletion Request. Once we have verified your Deletion Request, we will delete (and direct our service providers to delete) the Personal Information identified in your Deletion Request, except for Personal Information that is exempted by statute or regulation.

EXERCISING ACCESS, DATA PORTABILITY, AND DELETION RIGHTS

To exercise the access, data portability, and deletion rights described above, please submit a request to us by either:

- Calling us at 1-888-217-8385
- E-mailing your request with the information required below to: CCPA@combined.biz

Any request to exercise your rights under this Privacy Policy must contain sufficient information for us to verify your identity. We require a signed declaration under penalty of perjury before we will disclose the specific pieces of information that we have collected about you or proceed to delete Personal Information.

If you choose to make a request by e-mail, please provide your full name and your e-mail address, home and/or business address, and the phone number we would have in our records so that we are able to verify that you are the person about whom we collected Personal Information. Your e-mail should also describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. **Do not send your social security number, credit card number, passport number, or other identification card number** when you submit your request. The Personal Information you provide with your request will only be used to verify your identity. You may use an authorized agent to submit requests under this policy on your behalf. However, we may request copies of written authorization to such agent, and may also request that you independently verify the information contained in the request in order to confirm your identity.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity (and that of an authorized agent) and confirm the Personal Information relates to you.

You may also make a request on behalf of your minor child.

RESPONSE TIMING AND FORMAT

We will confirm receipt of the request within ten (10) days of its receipt. We endeavor to respond to requests within forty-five (45) days of receipt. If we require more time (up to an additional forty-five (45) 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.

The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We cannot and will not discriminate against any person, including with respect to the quality or cost of our services, on the basis of any request with respect to your Personal Information.

You may have similar rights under California Civil Code Section 1798.83, relating to our disclosure of certain Personal Information to third parties, which are also covered by our compliance with the requirements of this section and our obligations under the CCPA.

THIRD-PARTY SITES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site to which this Website contains a link. Please read the terms, conditions and policies of such third-party sites before accessing or using such sites. The inclusion of a link on the Website does not imply any endorsement of the linked site by us or by our affiliates.

SECURITY

To prevent unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss, and to ensure the correct use of information, we employ physical, technical and administrative procedures to safeguard this Website and the personal information we collect. All of our employees and any third parties we employ to process your personal information are obliged to respect its confidentiality. However, transmission of information through the internet is not secure. Although we seek to protect your information as described above, we cannot guarantee the security of any information you transmit to the website or to us, and you transmit such information at your own risk. Please do not send sensitive or confidential information to us by email or by any other means in connection with the Website. If you have reason to believe that your communications with us have been compromised in any way, please immediately notify us of the problem by contacting us as provided in the “**Contacting Us**” section below.

RETENTION PERIOD

We will retain your Personal Information and Other Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

USE OF SITE BY MINORS

The Website is not directed to individuals under the age of sixteen (16). No one under age 16 may provide any information to or on the Website. We do not knowingly collect Personal Information from children under 16. If you are under 16, do not use or provide any information on this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at CCPA@combined.biz or at 1-888-845-0023.

SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive information (e.g., Social Security numbers, credit card or other payment card information, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership), or other information you consider to be confidential, on or through the Website or otherwise to us.

CONTACTING US

If you have any questions about this Privacy Policy, please contact us by e-mail at CCPA@combined.biz , by phone at 1-888-217-8385, or at the address below.

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