

# Zale Properties, Inc. Property Management Privacy Policy

Effective: June 2023

Last Reviewed: December 2025

Welcome to Zale Properties, Inc. Property Company Privacy Policy (the “Policy”). For purposes of this Policy, the terms “Zale Properties” “we,” “us,” and “our” refer to Zale Properties Inc. Company, Zale Properties Inc, and all of their respective affiliates, subsidiaries, parents, members, and managers. “You” or “your” refers to you, as a user of our services, including any use of our websites, and software applications, whether operated by us or on our behalf (“Services”). It is important that you read this Policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing your Personal Information so that you understand how and why we are using your data. This Policy supplements those other notices and is not intended to override them.

## This Policy describes:

- Personal Information We Collect
- How We Collect Your Personal Information;
- How We Use Your Personal Information;
- How We Disclose Your Personal Information;
- Changes to the Policy; and
- Questions About This Policy

## PERSONAL INFORMATION WE COLLECT

“Personal Information,” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household. It does not include anonymous or aggregated data that cannot be associated with an individual or household.

We may collect, use, store, and transfer different kinds of Personal Information about you, which we have grouped together as follows:

- **Identifiers** such as first name, maiden name, last name, alias, username or similar unique personal identifier, account name, online identifier, social security number, driver’s license number or other government ID, date of birth, mother’s maiden name, and identifiers for family members.
- **Contact Information** such as current address, previous address, billing address, email address, telephone numbers, and emergency contact information and relationship.
- **Financial Information** such as bank account number, routing number, credit or debit card number, and payment details.
- **Commercial Information** such as details about payments to and from you, other details of products and services you have purchased from us, or payment history.
- **Professional or Employment-Related Information** such as your current employer, salary, and employment status.
- **Vehicle Information** such as the type, make, model, year, color, and license plate number for you and any family members living with you.
- **Pet Information** such as the name, type, breed, color, weight, age, license number, vet information, vaccination and rabies shot records, and microchip details for any family pets.
- **Audio, Electronic, and Visual Information** such as call and video recordings.
- **Internet and Other Electronic Network Activity Information** includes internet protocol (IP)

address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Services.

- **Usage Data** includes information about how you use our Services.
- **Marketing and Communications Information** such as marketing campaign data, click-throughs, your preferences and consent in receiving marketing from us and our third parties, email and text communications, and your communication preferences.
- **Inference Data** including inferences drawn from the Personal Information identified above.

### **Sensitive Personal Information**

We collect Personal Information that is defined as “Sensitive Personal Information” under Texas law, including social security number, driver’s license number, or other government ID. We do not use or disclose Sensitive Personal Information for any business purposes other than as permitted by law, including providing goods and services, verifying your information, and/or as permitted by further regulations. We may also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Information but is not considered Personal Information as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this privacy notice.

### **How Long Will You Use My Personal Information For?**

We will only retain your Personal Information for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

**Information You Provide To A Third Party.** The Services may include links and plug-ins to websites operated by third parties such as Twitter, Facebook, and Instagram buttons (“Third-Party Sites”). Zale does not control any Third-Party Sites and is not responsible for any information they may collect. The information collection practices of a Third-Party Site are governed by the privacy policy of such third parties. It is your choice to enter any Third-Party Site. We recommend that you read its privacy policy if you choose to do so.

**Children’s Privacy.** The Services are intended for adult use only and are not directed toward children, minors, or anyone under the age of 18. If you are under the age of 13, you are not authorized to provide us with any Personal Information. To the extent that we receive Personal Information of a child under 13 from their parent or guardian, we do not sell this information.

### **HOW WE COLLECT YOUR PERSONAL INFORMATION**

We may collect Personal Information from a variety of sources and methods. This includes:

#### **Information You Voluntarily Provide to Us**

You may give us your Personal Information by filling in forms, filling out a rental application or lease, or

by corresponding with us by post, phone, text, email, or otherwise. This includes Personal Information you provide when you:

- Submit a Request for Information form or Guest Card
- Submit a contact form
- Call, email, or text us
- Fill out a rental application
- Sign a lease
- Create an account on our Resident Portal
- Request maintenance or repair services
- Order or purchase other products and services
- Attend our events where we collect information about you
- Submit a review or testimonial

### **Information We Collect When You Use Our Services**

Automated technologies or interactions. As is true of most websites, we receive and store certain types of Personal Information whenever you interact with us online. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. When you access and use our Services from your mobile devices, we receive data from that mobile device. This may include your device ID, location data, IP address, and device type. You may manage how your mobile device and mobile browser share location information with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to the instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

Cookies are small files that we or our service provider transfer use cookies to help us understand how users use the Services. For example, cookies gather information about how long you spend on a web page so that we can understand what web pages are of most interest to users. If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies by adjusting your browser settings. For more information about cookies and about turning off cookies, please see <http://www.allaboutcookies.org> If you turn off your cookies, some of the features of the Services may not function properly.

### **Information We Collect From Third Parties**

We collect Personal Information from various third parties, including those listed below. The collection, use, and disclosure of Personal Information received from third parties is governed by the privacy policies listed on the website where the information was submitted by the user. Third parties may send their own cookies and pixel tags to you and may collect information and use it in a way inconsistent with this Policy. Please carefully review these third-party privacy policies to understand how your information may be collected, used and disclosed by these third parties.

Third-Party Service Providers. We collect Personal Information from service providers including where we operate accounts on third-party platforms, such as online application submission and management platforms, email platforms, and social media platforms.

Third-Party Advertising Partners. We collect Personal Data received from third-party advertising partners, including partners who host and manage various advertisements and online forms where you can request additional information.

Google Analytics. We use third-party cookies provided by Google Analytics to assist us in better understanding our website visitors. Google Analytics uses a first-party cookie, identifiers for mobile devices, or similar technology to collect usage data. Based on this information, Google Analytics compiles data about website traffic and interactions, which we use to offer better user experiences, perform analytics, analyze traffic, personalize content, and offer ads that match your interest. You can learn more about how Google Analytics collects and uses information from our website at: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

Your 'Do Not Track' Browser Setting. Some web browsers incorporate a "Do Not Track" feature (DNT) that signals to the websites that you visit that you do not want to have your online activity tracked. Many websites and applications, including the Services, do not currently respond to web browser DNT signals because such signals are not yet uniform. For more information about DNT signals, please visit <http://allaboutdnt.com>. Other third-party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

## **HOW WE USE YOUR PERSONAL INFORMATION**

Our primary purpose for collecting Personal Information is to provide you with products and services you request. We may also use your Personal Information for the following business purposes:

- To provide you with information, products and/or services you request. This includes: processing rental applications, running credit checks, verifying information, generating leases, providing maintenance and repair services, obtaining payment, managing our properties, communicating and managing our customer relationship with you
- For our marketing activities, which include, but are not limited to, sending you material about products, services, updates, etc. that we think may be of interest to you and to customize the advertising and content you see.
- For internal business purposes such as complying with our internal policies, analyze how our Services are being accessed and used, or improving our Services
- To protect our interests, including establishing, exercising and defending legal rights and claims
- As necessary to comply with legal requirements, to enforce our lease terms, to prevent fraud, to cooperate with law enforcement and regulatory authorities, and to stop other prohibited, illegal, or harmful activities
- For purposes disclosed at the time you provide your information or as otherwise set forth in this Policy

## **HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

We disclose your Personal Information with third parties only in the ways that are described in this Policy and with our business partners, suppliers and sub-contractors in order to provide you with our Services and perform any contract we enter into with them or you.

**Information You Instruct Us to Disclose.** You may be presented with an option on our Service to have us send certain information to third parties or give them access to it. If you choose to do so, your Personal Information and other information may be disclosed to such third parties and all information you disclose will be subject to the third-party privacy policies and practices of such third parties.

**Service Providers.** We may use third-party service providers to perform certain business services on behalf of us or the Service and may disclose Personal Information to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose, or

retain the Personal Information to provide these services and are prohibited from selling Personal Information. Business services provided include but are not limited to, maintenance and repair services, hosting services, software as a service, document management services, communications services such as email, text, and chat services, software and website development services, collection services, accounting and audit services, compliance services, quality control services, analytics services, call center services, housing services, marketing services, employment, and employment verification services.

**Internal Third Parties.** We may disclose Personal Information to our parent company, subsidiaries, and other companies owned by or controlled by Zale who may use the Personal Information for the purposes described above.

Categories of Personal Information that have been disclosed to service providers and internal third parties for a business purpose in the past twelve months include:

- Identifiers
- Characteristics of protected classifications under Texas or federal law
- Contact Information
- Financial Information
- Commercial Information
- Professional or Employment-Related Information
- Vehicle Information
- Pet Information
- Audio, Electronic, and Visual Information
- Internet and Other Electronic Network Activity Information
- Usage Data
- Marketing and Communications Information
- Inference Data

**Business Transactions.** We may do business with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information in the same way as set out in this Policy.

**Legal Process.** Subject to applicable law, we may disclose information about you (i) if we are required to do so by law, regulation or legal process, such as a subpoena; (ii) in response to requests by government entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to prevent physical, financial or other harm, injury or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.

**Personal Information Sold or “Shared”.** We have not sold any Personal Information in the past twelve months. We have “shared” Personal Information in the past twelve months with our third party advertising partners to serve ads to you about our products and services as you browse the Internet. “Sharing” is defined under Texas privacy law as “renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.” This sharing means that these third-party service providers may use their own cookies or tags to track your online activities and purchases in order to deliver targeted advertising based on your interests. You can opt to share through the Your Privacy Choices link. Additionally, if your browser supports it, you can turn on the Global Privacy Control (GPC) to opt out of the “sharing” of your Personal Information. Learn more at the Global Privacy Control website. Zale has

no actual knowledge of any sales or sharing of Personal Information of minors under 16 years of age.

#### **CHANGES TO THIS PRIVACY NOTICE**

Zale Properties may modify or update this Policy from time to time. We encourage you to revisit this page often to remain fully informed of our Policy or you can contact us at any time to obtain the latest copy of this Policy. Where changes to this Privacy will have a fundamental impact on the nature of how we collect, use, or share your data, Zale Properties will give advance notice of such changes.

#### **QUESTIONS ABOUT THIS POLICY**

For questions or comments regarding our Policy, please contact us at:

Email: [tnix@zaleproperties.com](mailto:tnix@zaleproperties.com)

Phone: (214-987-9001)