

PRIVACY POLICY

Last Updated: August 26, 2024

PRISM Community Management, Inc. (“Company,” “we,” “us,” or “our”) provides this Privacy Policy (“Policy”) to describe our privacy practices regarding personal information we collect from individuals (“you” or “your”), including when you visit our websites or our mobile applications (collectively, the “Sites”).

If you do not agree with all of the terms of this Policy, you should not use, browse, or otherwise access any of the Sites. By browsing or using any of the Sites, you agree to our collection and use of your personal information as described in this Policy and in our Terms of Use.

This Policy does not cover the personal information we collect about employees independent contractors, or job applicants.

Definition of Personal Information

For the purpose of this Policy, “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, with a particular individual or household. It does not include publicly available personal information.

What Personal Information Do We Collect

This section describes the types of personal information we collect about you:

- **Personal identifiers:** Name, physical address, email address, phone numbers and other contact information, whether you live in a community managed by us, and IP addresses
- **Professional information:** Job title, name, and contact information of employer or entity you represent; status as a board member of your homeowner’s association or residential community; name and location of the homeowner’s association or residential community you represent.
- **Internet or other electronic network activity:** Information regarding your browsing history, visits to and interaction with our Sites and advertisements, information about visits to our social media accounts, and device IDs.

Why Do We Collect Personal Information

For each of the types of personal information above, the following explains why we collect and use that information.

Provide You with Services on Behalf of Our Clients: We use your personal information to provide a full range of property management services to our clients, including management of facilities, public grounds, and common areas in communities; contacting you and responding to your requests and inquiries; facilitating sales and leasing/rentals; processing payments; responding to

requests for documentation associated with the association or ownership/leasing/rental of real property within each community; providing marketing; facilitating the operation of association boards of directors; providing customer service; operating a call-in center; distributing newsletters and similar materials; compliance with applicable laws, regulations or codes of practice.

Provide You With Additional Services: In addition, we collect personal information that may be used to market and provide information about our Services and company; improve the Sites by, among other things, understanding who uses it and how; and compliance with applicable laws, regulations, or codes of practice.

Security and Fraud Prevention and Detection: We use information for security purposes such as fraud prevention and detection. We may use personal information, for fraud prevention, or to protect our company, affiliates, our clients, our Sites, or a third-party website or platform.

Compliance with Laws and for Protection: We use your personal information for auditing, legal, and compliance purposes including responding to court orders or subpoenas. We may also share your personal information if a government agency or investigatory body requests. We may also use your personal information if we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property, or safety of others.

Marketing and Recruiting: We may use personal information to inform you about the Company and the services we offer. We may also use your personal information to send you information about career opportunities.

Communications: We may use personal information to communicate with you about your account or our relationship. We may contact you about your use of our Sites. We may contact you about your account or feedback. We might also contact you about this Policy or the site's Terms of Use.

Debug and Identify Errors: We may use your personal information to debug, identify, and repair errors that impair existing intended functionality.

Statistical Analysis and Research: We may use your personal information for statistical analysis and research purposes including analyzing performance.

Retention of Information

We retain the personal information we collect for the length of time necessary to provide our Services and to comply with legal obligations or to protect our legal rights.

Use or Disclosure of Sensitive Personal Information

We do not use or disclose sensitive personal information to create profiles about or infer characteristics about individuals, or for any purposes other than providing our Services.

Disclosure of Personal Information

For purposes related to our business, we may have disclosed personal information to the following types of third parties: Service providers that provide; customer relationship management (CRM) services; internet, IT, and telecommunications services; analytics information; advertising and marketing services; printing, mailing, or other communications services; legal and accounting services;

More About How We May Disclose Personal Information

For each of the types of personal information we may collect, we may also collect and share personal information with third parties to comply with legal obligations; when we believe in good faith that applicable law requires it; at the request of governmental authorities or other third parties conducting an investigation; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of our business, third parties, visitors to the Sites, or the public. We may also share personal information with any person to whom we transfer any of our rights or obligations under any agreement, or in connection with an actual or contemplated sale, merger, or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

Cookies and Other Tracking Technologies

Cookies are small, sometimes encrypted text files that are stored on computer hard drives by websites that you visit. They are used to help users navigate websites efficiently as well as to provide information to the owner of the websites. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org.

When you visit our Sites, we may place a “cookie” or other online tracking devices (e.g., web beacons) that recognize you. The cookies and other tracking technologies may also collect information about your IP address or actions taken in connection with the Sites. We may use cookies or similar tracking technologies to capture information about the use of our Sites, including to improve your user experience. Accordingly, we may store and retrieve information on your device through the use of cookies and similar technologies.

We may use Google Analytics to evaluate the use of our Sites. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit a website, what pages they visit when they do so, and what other websites they visit before visiting a website. To learn more about how Google Analytics collects personal information, review [Google's Privacy Policy](#).

We may also allow third parties to set cookies and other trackers when you visit our Sites which may collect information about your online activities over time and across different websites, applications, or other online platforms. These third parties may use such information to, for example, provide analytics information or to offer products or services in which you may be

interested, and they may combine information about your activities across different websites, applications, or other online platforms to do so.

Personal Information of Minors

Our Sites are not directed to minors under the age of 13. Additionally, we do not knowingly collect or sell personal information of minors under 16.

Security

We employ reasonable security procedures appropriate to the nature of the personal information that we collect, use, retain, transfer, or otherwise process. Our reasonable security program is implemented and maintained per applicable law and relevant standards. However, there is no perfect security, and reasonable security is a process that involves risk management rather than risk elimination. While we are committed to working with our Site provider in developing, implementing, maintaining, monitoring, and updating a reasonable information security program, no such program can be perfect; in other words, all risks cannot reasonably be eliminated. Data security incidents and breaches can occur due to vulnerabilities, criminal exploits, or other factors that cannot reasonably be prevented. Accordingly, while our reasonable security program is designed to manage data security risks and thus help prevent data security incidents and breaches, it cannot be assumed that the occurrence of any given incident or breach results from our failure to implement and maintain reasonable security.

Changes to this Privacy Policy

We reserve the right to amend, alter, or otherwise change this Privacy Policy in our sole and absolute discretion. If we make material changes to the Privacy Policy, we will post a notice on the Sites. Further use of the Sites following any such notification constitutes your agreement to follow and to be bound by the amended Privacy Policy.

Accessibility Policy

The Company is committed to ensuring that our communications, including our Sites, are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at contactus@prismcommunitymanagement.com.

Contact Us

If you have any questions about our Privacy Policy, or to request a copy of this Privacy Policy in another format, you may email us at contactus@prismcommunitymanagement.com or at the following address:

PRISM Community Management, Inc.
7777 Glades Road
Suite 100
Boca Raton, Florida 33434
(561) 903-5220

When contacting us, please be sure to provide your name, your physical address, your email address, your phone number (if you wish to be contacted by telephone), and a description of the question or issue that you wish to have resolved.