

# Privacy Policy

This Privacy Policy has been prepared by LWR Communities, LLC. ("Lakewood Ranch", "LWR" "we", "us", "our") and outlines how we collect, use, disclose, and otherwise manage personal information when you visit our website lakewoodranch.com (the "Website"), our information center, and interact with us in other ways. This Privacy Policy also describes the privacy practices associated with the Website and other consumer interactions with Lakewood Ranch.

# Collection and Use of Personal Information

We collect personal information in various ways, both online through our website and offline during in-person interactions, such as at our information center or events.

# ONLINE (WEBSITE FORMS & CHAT):

When you interact with our website, we may collect information such as:

- Your name, email address, mailing address, phone number
- Information included in submitted online forms (e.g., scheduling appointments, inquiries, newsletter sign-ups)
- Technical data such as IP address, browser type, and pages visited

#### OFFLINE (GUEST REGISTRY AND EVENTS):

When you visit our information center or attend events, we may collect:

- Your name, email address, mailing address, and phone number through guest registration forms.
- You may also choose to provide optional information such as your age group, current housing situation, reason for moving, desired housing characteristics, and purchase time frame.
- Photo Release Information: At our events you may also be asked to sign a separate photo release form, which gives your consent for us to use photos of you for marketing and promotional purposes. Filling out a guest registration form does not automatically grant photo usage consent. Photo release consent if only obtained through a separate form, and it will specify the purposes for which your photos may be used (e.g., marketing materials, social media).

# We use this information to:

- Provide the services and information you request
- Send you newsletters and marketing communications (with your consent)
- Improve website and marketing efforts
- Personalize your experience both online and offline

We use the information provided on the registration form to better understand your needs, assist you in finding a suitable home; tailor our communications about homes in Lakewood Ranch, products, and services; and for marketing purposes when consent is provided. We also use this information on an aggregate basis to better understand our customers and to improve our product and service offerings. We may receive information from third parties such as advertising and marketing partners, public databases, and social media platforms, to supplement the information we receive from our consumers. If we do so, this policy governs how we can use that information.

# MARKETING COMMUNICATIONS:

When you complete a registration form, interact with our chat service or otherwise sign-up to receive information regarding Lakewood Ranch, homes, and related products and services, we collect your contact information such as your name, mailing address, mobile, work or home telephone numbers and email address. We enter this information in our Customer Relationship Management system (CRM) and use the information you provided to send you communications by mail, email or telephone. You can opt-out of receiving future marketing and promotional communications at any time by clicking on the unsubscribe link included in our email communications or by contacting us as set out under "Contact Us" below.

We will not disclose your Personal Information to third parties for marketing purposes unless you grant permission upon registration. If you wish to opt out, please contact us as set out under "Contact Us" below. Please note that we may continue to share your Personal Information with our affiliates, including homebuilders and third-party service providers, for essential purposes described above and other such circumstances.

# SURVEY AND CUSTOMER RESEARCH:

From time to time, we may offer you the opportunity to participate in one of our surveys or other customer research. We may collect certain personal information such as your name and email address. The information obtained through our surveys and customer research is used in an aggregated, non-personally identifiable form to help us understand our customers and to enhance our product and service offerings.

#### **CUSTOMER SERVICE:**

When you contact us with a comment, question or complaint, you may be asked for information that identifies you (such as your name, address and a telephone number) along with additional information we need to help us promptly answer your question or respond to your comment or complaint. We may retain this information to assist you in the future and to improve our customer service and product and service offerings. We also use personal information to establish and manage our relationship with you and provide quality customer service.

#### DISCLOSURE AND SHARING OF PERSONAL INFORMATION:

We may share your personal information with third-party service providers, builders, and other relevant partners (e.g., The Lakewood Ranch Community Activities, The Stewardship District) who assist us in operating our community, conducting our business, or providing you with services. These third parties are bound by confidentiality obligations and are required to protect your information in accordance with this Privacy Policy and applicable laws.

#### **SERVICE PROVIDERS:**

Your personal information may be transferred (or otherwise made available) to our affiliates and other third parties who provide services on our behalf. Our website may link to other websites and online services. We have no control over such third parties and therefore cannot be responsible for the content, availability, or security of such linked third-party websites, so please read their privacy policies carefully. Third parties may use your information for their own purposes, including behavioral or advertising purposes. This Privacy Policy does not address the privacy and data security practices of any third parties. The inclusion of a link on this website does not imply endorsement of the linked third-party website or their products and services and is provided for your convenience only. If you decide to access any of the third-party websites linked to our website, you do so subject to the terms and conditions of use for such third-party websites.

We may use service providers to provide services such as maintaining our website, providing services related to our website, sending electronic mail or other functions related to our business and services. Our service providers are given the information they need to perform their designated functions and are not authorized to use or disclose personal information for their own marketing or other purposes.

Your personal information may be maintained and processed by us, our affiliates and other third-party service providers in Canada or other jurisdictions. In the event personal information is transferred to Canada or other foreign jurisdiction, it will be subject to the laws of that jurisdiction and may be disclosed to or accessed by the courts (or related parties), law enforcement and governmental authorities in accordance with those laws.

## LEGAL/COMPLIANCE:

LWR Communities, LLC., its affiliates and its US, Canadian and other foreign service providers may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise required or permitted by applicable US, Canadian or other law. Your personal information may also be disclosed where necessary for the establishment, exercise or defense of legal claims and to investigate or prevent actual or suspect loss or harm to persons or property.

#### CHILDREN UNDER 18:

We do not intend for our website or other online services to knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow minors under the age of 18 to disclose their Personal Information to us through the website. The website is directed to individuals who are permitted to share their Personal Information without parental consent. If you believe that we might have any information from a child under 18, please contact us as directed below in the "Contact Us" section. You may mark your inquiry "COPPA Information Request."

#### **VISITING OUR WEBSITE:**

We and/or our service providers collect IP (Internet protocol) addresses from all visitors to the website and other related information such as page requests, browser type, operating system and average time spent on our website. This information is used to help us understand our website activity, and to monitor and improve the website.

#### COOKIES, TRACKING TAGS & WEB BEACONS:

Our website uses a technology called "cookies" and similar technologies. A cookie is a tiny element of data that our website can send to your browser, which may then be stored on your hard drive so we can recognize you when you return. If you have registered with our website, these cookies may let us know who you are and identify your browser as one that has visited the website before. We also use cookies to provide us and our service providers with information about your use of the website (such as web pages visited) that we will use to personalize our website in accordance with your interests and assumed preferences.

You may set your web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our website, you may not be able to take advantage of all of the features of our website. Our website may also use a technology called "tracking tags" or "Web Beacons" such as Google Tag Manager. This technology allows us to understand which pages you visit on our website. These tracer tags are used to help us optimize and tailor our website for you and other future visitors to our website.

Our website is not designed to respond to "do not track" signals received from browsers.

# **ANALYTICS:**

We may use a third party such as Google Analytics to help us gather and analyze information about the areas that you visit on our website. Such third parties may use technologies such as cookies, web server logs and web beacons. We use this information to evaluate and improve the customer experience and the convenience of our website, and to help us evaluate some of the specific information related to your website visits. For more information, see "How Google uses data when you use our partners' sites or apps".

# INTEREST-BASED ADVERTISING:

We may use third parties to serve our advertisements on other websites. These companies may use cookies, tracer tags or web beacons to report certain information about your visits to our website and other websites (such as web pages you visit and your response to ads) in order to measure the effectiveness of our marketing campaigns and to deliver ads that are more relevant to you, both on and off our website.

To find out more about the collection and use of information by third parties for behavioral advertising purposes, or if you would like to opt-out of certain third-party cookies and make selections about what online advertisement you choose to receive, you can visit the Digital Advertising Alliance website at http://www.digitaladvertisingalliance.org/ or http://www.aboutads.info/choices/. You can opt-out of interest-based ads from Google by visiting adssettings.google.com.

#### THIRD PARTY LINKS:

Our website may contain links to other sites that we do not own or operate, including social media websites. Also, links to our website may be featured on third party websites. Except as provided herein, we will not provide any of your personal information to these third parties without your consent. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

#### **SOCIAL MEDIA:**

We may offer you the opportunity to engage with our content on or through third-party social networking websites, plugins and applications. When you engage with our content on or through third-party social networking websites, plugins and applications, you may allow us to have access to certain information associated with your social media account (e.g., name, username, email address, profile picture, gender) to deliver the content or as part of the operation of the website, plugin or application. When you provide information from your social media account, we may use this information to personalize your experience on the Website and on the third-party social networking websites, plugins and applications, and to provide you with other products or services you may request.

#### CHAT FEATURE INFORMATION COLLECTION:

When you use our chat feature, we may collect and store the information you provide during the conversation, including your name, contact details, and any other personal or sensitive information you choose to share. We use this information to respond to your inquiries, improve our services, and ensure quality and security. Chat transcripts may be retained for training, monitoring, and compliance purposes, in accordance with this Privacy Policy.

#### SAFEGUARDS AND RETENTION:

We have implemented reasonable administrative, technical and physical measures in an effort to safeguard the personal information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. We restrict access to your personal information on a need-to-know basis to employees and authorized service providers who require access to fulfil their job requirements.

### ACCESS TO YOUR PERSONAL INFORMATION:

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. You may request access, update and correct inaccuracies in personal information we have in our custody or control, by emailing or writing to us at the contact information set out below. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records.

Notice for California Residents: How We Sell Your Information Lakewood Ranch does not engage in the sale of your personal information.

# Your Rights

#### ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS:

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, if applicable, we will disclose to you the categories of personal information we collected about you, the categories of sources for the personal information we collected about you, the business or commercial purpose for engaging in the sale or collection of that personal information, the categories of third parties with whom your personal information is shared, and specific pieces of personal information we collected about you. You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. You also have the right at any time to direct us not to sell your personal information, which is your right to opt-out. In the preceding twelve months we have not sold personal information. We will not discriminate against you for exercising any of your CCPA rights.

To exercise the access, data portability, and deletion rights described above, submit a verifiable consumer request to us by contacting us as set out under "Contact Us" below. This Privacy Policy may be updated periodically to reflect changes to our personal information practices. We will post the updated Privacy Policy on our website. Your personal information will be treated in accordance with the Privacy Policy in place at the time your personal information was collected, unless you otherwise consent.

# **CONTACT US:**

# Please contact us if:

- You have any questions or comments about this Privacy Policy,
- You wish to access, update, and/or correct inaccuracies in your personal information, or
- You otherwise have a question or complaint about the manner in which we or our service providers treat your personal information.

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