

Privacy Policy

This Privacy Policy ("Privacy Policy") governs how Shoma Alliance Management Corp. and our affiliated companies (collectively, "Shoma," "we," "us," "our") collect, use and disclose personal information about visitors to our websites, people we meet in person or by phone, our customers and prospective customers, and others whose personal information we collect and retain ("you," "your," or "our").

If you voluntarily provide your information in the course of interacting with Shoma's websites or apps, applying to lease or buy a property managed or owned by us, visiting any of our locations, or otherwise using our services, we will accept that as your consent to our collection, use, and disclosure of your information as set forth in this Privacy Policy. This Privacy Policy is part of our Terms of Use, which govern your use of our websites and services. By using Shoma's websites, contacting us to inquire about our services or properties, or visiting our locations, you consent to our Privacy Policy and agree to our Terms of Use.

What Information We Collect

The term "Personal Information" as used in this Privacy Policy refers to information that identifies you as an individual or relates to you as an identifiable individual. We collect information that you provide us when you create an account, contact us, or otherwise access or use our services, any information you voluntarily submit to us, and information regarding how you use our services. Personal Information includes, but is not limited to, the following:

- Your internet protocol address (i.e., IP address) and, if you access our services from a mobile application, your unique mobile device ID number and non-email authentication.
- Your name, email address, postal address, telephone number, profession, profile picture, credit card information and your responses to surveys that we may ask you to complete for research purposes or to help direct Shoma activities, the contact information of your representative, your social media account information.
- Details of any financial transactions you participate in on our services, including the amount, currency, and method of payment.
- Browser and device information and information collected through technologies such as cookies.

We may collect this information when you:

- Contact us regarding a question, concern, or inquiry, such as when you make inquiries concerning our project(s) or location(s) (including at in-person events such as open houses, or by phone or email);
- Request information from us via forms or emails, such as signing up for our newsletter or requesting information about our project(s) or location(s);
- Register and create an account on any of our websites;
- Sign up or request to be placed on our mailing and/or email marketing lists;
- Sign up for free Wi-Fi at any of our locations;
- Apply for employment with Shoma;
- Apply for a lease or to purchase a unit at one of the properties that we own or manage;
- Are a resident or visitor of one of the properties we own or manage;
- Provide billing information to us;
- Post user-generated content in any of our property's residential forums; and/or
- Otherwise interact with our websites or our representatives.

Your decision to provide us with information is voluntary, but if you choose not to provide any requested information, you may not be able to take advantage of all of our websites' features or our services.

Use of Cookies and other Tracking Technologies

We may use various methods and technologies to store or collect Personal Information (“**Tracking Technologies**”). Tracking Technologies may set, change, alter or modify settings or configurations on your Device. Some of the Tracking Technologies used on our websites, include, but are not limited to, the following (as well as future-developed tracking technology or methods that are not listed here):

- *Cookies.* A "cookie" is a small file placed on your hard drive by some of our web pages. We, or third parties we do business with, may use cookies to help us analyze our web page flow, customize our services, content, and advertising, measure promotional effectiveness, and promote trust and safety. Cookies are commonly used at most major transactional websites in much the same way we use them in our Services. You may delete and block all cookies from our services, but parts of the services may not work. We want to be open about our cookie use. You can reduce the information cookies collected from your device. An easy way of doing this is often to change the settings in your browser. If you do that you should know that (a) your use of our services may be adversely affected (and possibly entirely prevented), (b) your experience of this and other sites that use cookies to enhance or personalize your experience may be adversely affected, and (c) you may not be presented with advertising that reflects the way that you use our and other sites. You find out how to make these changes to your browser at this site: www.allaboutcookies.org/manage-cookies/. Unless you have adjusted your browser settings so that it will refuse cookies, our system will send cookies as soon as you access our services. By using our services, you consent to this, unless you change your browser settings.
- *Embedded Scripts.* An embedded script is programming code that is designed to collect information about your interactions with our websites, such as the links you click on.
- *Browser Fingerprinting.* Collection and analysis of information from your electronic device, such as, without limitation, your operating system, plug-ins, system fonts and other data, for purposes of identification.

Why We Collect Personal Information

We use the Personal Information we collect to:

- Respond to your requests for information;
- Maintain your account;
- Verify your identity and for fraud prevention;
- Process your payments or purchases;
- Analyze and evaluate your employment application;
- Analyze and evaluate your lease and/or purchase application;
- Provide you with maintenance and/or concierge services;
- Allow you to use and access our websites, including for the prevention of fraudulent activity and improved security functionality or to allow you to make use of cart or payment functionality;
- Assess the performance of our websites, including as part of our analytic practices or otherwise to improve the content, products, or services offered through our websites;
- Protect, investigate, and deter against fraudulent, unauthorized, or illegal activity;
- Link or combine user information with other Personal Information;
- Compare and verify information for accuracy and update our records;
- Email, text, message, or otherwise contact you with information and updates about us and our services;
- Respond to your comments and questions, and provide customer service;
- Send you information, including confirmations, billing and invoices, technical notices, updates, security alerts, and support and administrative messages;
- Analyze how you use our services with tools such as Google Analytics and other tools to help us understand traffic patterns and know if there are problems with our services; and
- Deliver content relevant to your interests on our websites and third-party sites based on how you interact with our advertisements and/or content.

Whether We Share Your Personal Information

We do not rent, sell, or share your Personal Information with non-affiliated third parties, except with your consent or as necessary to complete any transaction or provide any service you have requested or authorized.

To help us carry out our business operations, we may provide limited access to some of your Personal Information to the following third parties:

- **Business Partners:** Sometimes we collaborate with other organizations to deliver our services. In such cases, we may share your name, contact information and other details you provide when contact our parent, subsidiaries, affiliates, and business partners.
- **Service Providers:** We work with a wide range of third-party providers, notably our database administrators, cloud computing services, advertising services, data analysts, application service providers, bulk SMS services, and other non-governmental organizations.
- **Payment Processors:** We work with payment processors to help process credit card transactions and other payment methods made through our services. These payment processors will store certain information about you. Please refer to their privacy policies to learn more about how they use your Personal Information.

We may store information such as survey responses and contact information, that are necessary to enable us to operate effectively and deliver our services to you. We may also transfer your Personal Information to a third party as a result of a merger, acquisition, reorganization or similar transaction; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of our services; and to protect the rights or property of Shoma. In such event, and to the extent legally permitted, we will notify you and, if there are material changes in relation to the processing of your Personal Information, give you an opportunity to consent to such changes.

Protection and Retention of Personal Information

Shoma maintains administrative, technical, and physical safeguards to protect the security, confidentiality, and integrity of your personal information appropriate to the nature of the personal information we collect. While the measures we implement are intended to reduce the likelihood of security problems, we cannot guarantee that these measures will prevent unauthorized access to your personal information. In particular, information transmitted over the Internet may find its way to recipients to whom it is not intended or persons you may not want to have such information. Under certain circumstances, this may be beyond the control of Shoma, and you are advised that such transmission may not be secure. By using our websites and services, you acknowledge that you understand and agree to assume these risks.

The safety and security of your Personal Information also depends on you. If you have an account with us, you are responsible for keeping your user and password details confidential. Your account is protected by your account password and we urge you to take steps to keep your Personal Information safe by not disclosing your password and by logging out of your account after each use.

We retain personal information for as long as we reasonably require it for legal or business purposes. When we no longer have a legitimate business interest in keeping your personal information, we will delete or destroy it. In determining retention periods, Shoma takes into consideration warranty periods, other contractual obligations, applicable laws, and what we reasonably believe are your expectations and requirements. For example, if you lease or purchase a home, we will retain your information for as long as you lease or own your home and as long as required by our contracts and by law. If you submit a request for information about our products or services, we will retain your contact and preferences information and consider our relationship to remain active for marketing purposes after fulfilling any request you submit and until we take note that you no longer show interest in our products or services.

Children's Policy

Our websites and services are not designed to attract children and our websites are not intended for use by any children under the age of 13. We do not request, or knowingly collect, any Personally Information from children under the age of 13. Minors under the age of 16 (but older than 12) may use our websites only under the supervision of a parent or legal guardian who agrees to be bound by Shoma's Terms of Use. If you are the parent or guardian of a child under 13 who has provided her or his information to us, please contact us immediately at privacypolicy@shomagroup.com to request deletion of that information.

Linking to Other Websites and Social Network Access

Our online services may provide links to the websites of companies providing products and services that may be of interest to you. Each of these companies has its own privacy policy that may differ from Shoma's Privacy Policy. If you click on the link, you will be transferred to that company's website, and any personal information you share on that website will be subject to the privacy policy or practices of that website owner and will not be subject to Shoma's Privacy Policy. Shoma does not have any control over, or responsibility for, the privacy practices or website content of any business associate. The use of any such websites is at your own risk. We do not endorse and are not responsible for the availability of, or for any content, advertising, products, or other materials on or available from, third-party websites. By using our websites, you agree that we will not be liable for any damage or loss caused by your use of or reliance on any content, advertising, products, or other materials on or available from any third-party websites.

Some of our online services allow you sign into and associate your social network accounts including, but not limited to, Twitter, LinkedIn, Facebook, YouTube and Instagram with your Shoma account. By using this functionality, you grant Shoma permission to access all of the elements of your social network profile information that you have made available to be shared and to use it in accordance with the social network's terms of use and this Privacy Policy. Please refer to the privacy settings in your social network account for information about what data is shared with us and other connected applications and to manage the data that is shared through your account, including information about your activities using our sites. If you would like to disconnect a social media account from Shoma, refer to the settings of that social media account and its provider.

Opting Out of Email Communications.

We may use some of the information we collect for marketing purposes, including to send you promotional communications about new Shoma features, products, events, or other opportunities. If you wish to stop receiving these communications or to opt out of use of your information for these purposes, please follow the opt-out instructions, such as clicking "Unsubscribe" (or similar opt-out language) in those communications. You can also contact us at privacypolicy@shomagroup.com to opt out. Despite your indicated e-mail preferences, we may send you service-related communications, including notices of any updates to our terms of service or privacy policy.

California Residents

California Consumer Privacy Act

This section of our Privacy Policy supplements our Privacy Policy to provide additional information under the California Consumer Privacy Act of 2018, as amended, and applies only to consumers who reside in the State of California.

Right to Opt-Out

As a California resident, you have the right, at any time, to tell us not to sell Personal Information to others. This is known as the "right to opt-out" of the sale of Personal Information.

Right to Know About Personal Information Collected, Disclosed, or Sold

California consumers have the right to request any of the following information from Shoma regarding personal information collected about the consumer or the consumer's household during the last twelve (12) months:

1. The categories of personal information collected about you.
2. The categories of sources from which the personal information is collected.
3. The business or commercial purpose for collecting or selling personal information.
4. For personal information sold or exchanged for value with a third party: categories of personal information and categories of third parties.
5. For personal information disclosed to a third party for a business purpose: categories of personal information; and categories third parties.
6. The specific pieces of personal information collected about you (except for very sensitive personally identifiable information).

The process by which we verify and respond to your requests is explained below under "How to Make a Verifiable California Consumer Request" and "How We Will Respond to a California Consumer Request." You may submit a Right to Know request to: privacypolicy@shomagroup.com.

Right to Deletion of Personal Information

California consumers have the right to request that Shoma delete any personal information about the consumer which Shoma has collected from the consumer, subject to a range of exclusions permitted by law. For example, Shoma is not required to delete personal information if it is necessary to complete a transaction, reasonably used for an ongoing business relationship, or used internally in a lawful manner that is compatible with the context in which the consumer provided the information. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exclusion applies. You may request deletion of your personal information by contacting us via privacypolicy@shomagroup.com. Please include the necessary information (e.g. name, email address, etc.) to verify your identity.

How to Make a Verifiable California Consumer Request

You may call, email, or write us with your request by using any of the following methods:

By Telephone: 1-786-437-8658

By email: privacypolicy@shomagroup.com

By Post Office Mail: 201 Sevilla Avenue, Suite 300, Coral Gables, Florida 33134 (Attn: Privacy Policy Dept.)

Please include "California Privacy Policy" as the subject line of your email or Post Office correspondence. In order for a request to be verifiable (including verification of your identity and your California residency), you may be required to confirm information that we have on file for you; including email address, phone numbers, full names, addresses and other personal information. You may therefore wish to include such information in your written request.

How We Will Respond to a California Consumer Request

We will respond to a verifiable consumer request within forty-five (45) days after receiving it, subject to delays and exclusions permitted by law. If we require more time to respond, we will let you know the reason why and extension period in writing. Please provide either your email address or U.S. Postal address, at your option. Our response will cover the twelve (12) month period preceding our receipt of the request. If we cannot comply with all or part of your request, we will explain the reasons why. 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 readily from one entity to another entity.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Protection from Discrimination for Exercising California Consumer Rights

We will not discriminate against a California consumer for exercising any of the rights described in this section. This means that except as legally permitted we will not:

- Deny you goods or services.
- Charge different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we are permitted to offer certain financial incentives that can result in different prices, rates, or quality levels if the material terms are provided to you in writing and you affirmatively opt-in to participate. You may revoke your opt-in consent at any time.

California Rights under “Shine the Light” Law

If you are a California resident, you may request a list of the types of customer information we provided to third parties for their direct marketing purposes and the names and addresses of all third parties with which we have shared such information during the past calendar year. We will provide the information to you free of charge within thirty (30) days of your request. To request that we provide you with such information, please send a written request to privacypolicy@shomagroup.com. Within thirty (30) days after receiving your request, we will provide you with the information at the address you designate in your request, which may be an email address or physical address.

Nevada Residents

If you are a Nevada resident, you have the right to request certain information from us regarding the collection and sale of your personal information (as defined in Nevada Revised Statutes 603A.320) during your visit to our websites or when you otherwise interact with us online. If you have sought or acquired, by purchase or lease, any goods or services for personal, family, or household purposes from our websites, you may ask us to disclose whether we have sold (for monetary consideration) certain information about you (including your first and last name, physical address, email address, telephone number, social security number, an identifier that allows you to be contacted either physically or online, or other contact information that allows us to identify you personally).

As a Nevada resident, you may also request to opt out of us sharing such information about you. To make this inquiry, please submit a request in writing to privacypolicy@shomagroup.com with “Nevada Privacy Policy” in the subject line. You must include your full name, email address, and attest that you are a Nevada

resident by providing a Nevada postal address in your request. Please state whether you are requesting information and/or opting out.

We will process your request within sixty (60) days, or we will let you know if we need additional time. We may require additional information to verify your identity before we can respond.

Changes to Our Privacy Policy

We reserve the right to modify or revise our Privacy Policy at any time by updating the Privacy Policy document posted on our websites, and the updated Privacy Policy will become effective on the date posted. You are bound by any such revisions and we therefore encourage you to visit our websites often for this and other important updates and announcements. You acknowledge that your continued use of our websites or services after we publish a notice about our changes to this Privacy Policy means that the collection, use and sharing of your Personal Information is subject to the updated Privacy Policy.

How to Contact Us

If you have any questions about this Privacy Policy, your Personal Information, the Terms of Use, or you want to obtain more information about Shoma's privacy practices, please contact us:

By Email: privacypolicy@shomagroup.com

By U.S. Postal Mail: 201 Sevilla Avenue, Suite 300, Coral Gables, Florida 33134 (Attn: Privacy Policy Dept.)

By Telephone: 1-786-437-8658

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