

# **PRIVACY POLICY – SNAPHOA**

*Last updated February 18, 2021*

Thank you for choosing to be part of our community at SnapHOA powered by Action Property Management, Inc. ("company", "we", "us", or "our). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [privacy@snaphoa.com](mailto:privacy@snaphoa.com). When you visit our websites and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Services").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

## **1. WHAT INFORMATION DO WE COLLECT, HOW IS IT USED, AND WHO IS IT SHARED WITH?**

### ***Personal Information You Disclose to Us***

*In Short: We collect personal information that you provide to us. We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent. We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We collect personal information that you voluntarily provide to us when registering for the Services, expressing an interest in obtaining information about us or our products and services, when participating in activities on the Services (such as creating an account or using our Sites) or otherwise contacting us. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the products and features you use. The personal information we collect can include the following:

| <b>Categories of Personal Information we collect may include:</b> | <b>Examples of how Personal Information is used include:</b>   | <b>Parties with whom your information may be shared include:</b>   |
|---|--|--|
| Identifiers;  | To provide services and improve Products, to provide information about products and services, for customer service purposes, to carry out obligations and protect rights arising from any contracts entered into between us and consumers, to protect the safety, security, and legal rights of other users of products and services, etc. | People and accounts you share and communicate with, Association Board Members, vendors and service providers, and those with whom it may be reasonably necessary to achieve legitimate business interests. |

|  |   |   |
|--|---|---|
| Commercial information, if you choose to provide it;   | Promoting safety, integrity, and security, and performing other business purposes.  | New owners in the event of a change of ownership or control of all or part of our Products or their assets changes.   |
| Internet or other electronic network activity information, including content you view or engage with;    | Communicating with you and sending you marketing and promotional communications. We and/or our third party marketing partners may use the personal information you send to us for marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below). | Partners, including partners who use our analytics services, advertisers, measurement partners, partners offering goods and services in our Products, vendors and service providers, and those with whom it may be reasonably necessary to achieve legitimate business interests. |
| Location-related information, including precise device location if you choose to allow us to collect it; | Creating entries, displaying region-specific information, and performing other business purposes.   | Law enforcement or other third parties in connection with legal requests.   |
| Audio or visual Information, including photos, if you or others choose to provide it;                    | Creating entries, improving customer service, and performing other business purposes.   | Partners, including partners who use our analytics services, advertisers, measurement partners, partners offering goods and services in our Products, vendors and service providers, and those with whom it may be reasonably necessary to achieve legitimate business interests. |
| Professional or employment information, if you choose to provide it; and                                 | Facilitating account creation and the logon process, providing measurement, analytics, advertising, and other business services, and improving our Products.  | Partners, including partners who use our analytics services, advertisers, measurement partners, partners offering goods and services in our Products, vendors and service providers, and those with whom it may be reasonably necessary to achieve legitimate business interests. |
| Financial information, if you choose to provide it.  | Facilitating transactions and other business services.  |   |

We share some of your personal information with trusted third-party service providers. When we disclose personal information to a service provider, we enter a contract that describes the purpose and requires the recipient to both keep the personal information confidential and not use it for any purpose except performing the contract. We reserve the right to release personal information in order to comply with government investigations, subpoenas, etc. All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### **Information Automatically Collected**

*In Short: Some information — such as IP address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and

usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. Online Identifiers. We collect devices; applications; tools and protocols. such as IP (Internet Protocol) addresses; cookie identifiers, or others such as the ones used for analytics and marketing; devices geolocation. and other similar data.

## **2. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

*In Short: We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Please contact us if you would like to request additional information about how we use such technologies and how you can refuse certain cookies.

## **3. DO WE USE GOOGLE MAPS?**

*In Short: Yes, we use Google Maps for the purpose of providing better service.*

This website or mobile application uses Google Maps APIs. You may find the Google Maps Platform Terms of Service [here](#). To better understand Google's Privacy Policy, please refer to [this link](#).

By using our Maps API Implementation, you agree to be bound by Google's Terms of Service. By using our implementation of the Google Maps APIs, you agree to allow us to gain access to information about you including personally identifiable information (such as usernames) and non-personally identifiable information (such as location). We will be collecting location information from the Google API.

For a full list of what we use information for, please see the previous section titled "WHAT INFORMATION DO WE COLLECT, HOW IS IT USED, AND WHO IS IT SHARED WITH?" You agree to allow us to obtain or cache your location. You may revoke your consent at any time. We use information about location in conjunction with data from other data providers. The Maps APIs that we use store and access cookies and other information on your devices.

## **4. THIRD-PARTY WEBSITES?**

*In Short: We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.*

The Services may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

## 5. HOW LONG DO WE KEEP YOUR INFORMATION?

*In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information in our active databases for longer than necessary for actual or foreseen business purposes after the termination of the user's account. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or if this is not possible (for example: because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 6. HOW DO WE KEEP YOUR INFORMATION SAFE?

*In Short: We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.

## 7. DO WE COLLECT INFORMATION FROM MINORS?

*In Short: We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [privacy@snaphoa.com](mailto:privacy@snaphoa.com).

## 8. WHAT ARE YOUR PRIVACY RIGHTS?

*In Short: You may review change, or terminate your account at any time.*

**Account Information:** If you would at any time like to review or change the information in your account or terminate your account, you can log into your account settings and update your user account. Upon your request to terminate your account, we will deactivate or delete your account and information from

our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by accessing your account settings and updating preferences. You will then be removed from the marketing email list — however, we will still need to send you service-related emails that are necessary for the administration and use of your account.

If you have questions or comments about your privacy rights, you may email us at [privacy@snaphoa.com](mailto:privacy@snaphoa.com).

## 9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (DNT) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

## 10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

*In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information. "Notice" below:*

Under the California Consumer Privacy Act (CCPA), residents of California have the following rights:

**Right to Know:** You have the right to request the following information collected and used during the past 12 months:

- The categories of personal information that we have collected.
- The categories of sources from which we collected personal information.
- The business or commercial purpose for collecting and/or selling personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we collected about you.
- If we sold personal information, a list identifying the personal information categories that each category of recipient purchased.
- If we disclosed your personal information for a business purpose, a list identifying the personal information categories that each category of recipient obtained.

**Right to Request Deletion:** You have the right to request that we delete your Personal Information that we have collected from you.

**Right to Access:** You have the right to request a copy of all the specific personal information that we have collected about them during the past 12 months.

**Right to Non-Discrimination:** We will not discriminate against you for exercising any of these rights.

To exercise your “right to know” or your “right to request deletion,” you may email us at [privacy@snaphoa.com](mailto:privacy@snaphoa.com) or call us at (800) 400-2284.

Please note that to protect your information and the integrity of our Products, we may need to verify your identity before processing your request. In some cases, we may need to collect additional information to verify your identity, such as a government issued ID. Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. We may request that your authorized agent have written permission from you to make requests on your behalf and may need to verify your authorized agent’s identity.

We have the right to deny a deletion request where the information is covered by an exception. The exceptions include where we currently use or anticipate using information to:

- complete the transaction for which we collected the personal information,
- provide a good or service that you requested,
- take actions reasonably anticipated within the context of the ongoing business relationship, or otherwise perform our contract with consumers;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- debug products to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided by law;
- enable solely internal uses that are reasonably aligned with consumer expectations based on our relationship with consumers;
- comply with a legal obligation, exercise or defend legal claims; or
- make other internal and lawful uses that information that are compatible with the context in which the consumer provided it.

## **11. DO WE MAKE UPDATES TO THIS POLICY?**

*In Short: Yes, per relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## **12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, you may email us at [privacy@snaphoa.com](mailto:privacy@snaphoa.com), call us at (800) 400-2284, or mail correspondence to:

Action Property Management, Inc.

2603 Main Street, Suite 500

Irvine, CA 92614