



ZEMAN HOMES INC.

PRIVACY NOTICE

Last revised: February 9, 2023

1. Introduction

Mobile Management Zeman Homes Inc. d/b/a Zeman Homes Inc. (“**Zeman Homes**” or “**we**” or “**us**”) respects your privacy and are committed to protecting it through our compliance with this privacy notice.

This Privacy Notice (our “**Privacy Notice**”) describes the types of information we may collect, use, maintain, protect, disclose, or otherwise process about you or that you may provide when you visit www.zemanhomes.com, <https://www.zemanrv.com>, or our resident portal located at mobile.twa.rentmanager.com (each, a “**Website**”) and our practices for collecting, using, maintaining, protecting, disclosing or otherwise processing that information.

This policy applies to information we collect:

- on our Websites;
- in email, text, and other electronic messages between you and our Websites; and
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by Zeman Homes or any third-party (including our affiliates and subsidiaries);
- us or any of our affiliates or subsidiaries related to your or any other individual’s employment or potential employment with us; or
- any third party including through any application or content (including advertising) that may link to or be accessible from or the Websites.

Please read this Privacy Notice carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Websites. By accessing or using our Websites, you agree to this Privacy Notice. This Privacy Notice may change from time to time (see [Changes to Our Privacy Notice](#)). Your continued use of our Websites after we make changes is deemed to be acceptance of those changes, so please check this Privacy Notice periodically for updates.

2. Children Under the Age of 18

Our Websites are not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Websites. We do not knowingly collect Personal Data from children under 18. If you are under 18, do not use or provide any information on our Website or on or through any of its features, including your name, address, telephone number, or email address. If we learn we have collected or received Personal Data from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information directly from a child under 18, please contact us at privacy@zemanhomes.com.

3. Information We Collect About You and How We Collect It

Throughout this Privacy Notice, the term “**Personal Data**” means any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or device. However, Personal Data does not include any deidentified or aggregated information.

Generally

We collect Personal Data from various sources, including:

- directly from you when you provide it to us;
- automatically as you navigate through the Websites;
- information that we create about you as you use our Websites; and
- From third parties, for example, our business partners and service providers that help us operate our business.

Information You Provide to Us

We collect the following types of Personal Data directly from you when you access or use our Websites: real name, home/work postal address, home/work email address, home/work telephone number, account name, social security number, drivers’ license or other state-issued ID number, passport number, financial information, insurance information, employer name, employment history, vehicle registration information, contact information for your emergency contacts, age, birthdate, color, ancestry, national origin, citizenship, religion or creed, medical conditions, physical or mental disability, gender, gender identity, gender expression, sexual orientation, pregnancy status, student or school affiliation if applicable, and any other identifier by which you may be contacted online or offline. Some of this information is optional and, if you provide it, we will only use it as permitted under applicable law, including the Fair Housing Act. We may also collect tokenized credit or other payment card information from our payment card processor, <https://intellipay.com/privacy-policy/>. In addition, we also collect other types of information that you may provide when you fill out a form or through your correspondence with us.

The Personal Data we collect on or through our Websites through:

- information that you provide by filling in forms on our Websites. This includes information provided at the time of inquiring about one of our communities, filling out an application to buy or rent a home in one of our communities, reserve a location at

one of our RV resorts, or make a payment online. We may also ask you for information when you report a problem with our Websites;

- records and copies of your correspondence (including email addresses), if you contact us;
- your responses to surveys that we may ask you to complete for research purposes; and
- your search queries on the Websites.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Websites, we may use automatic data collection technologies to collect certain Personal Data about your interaction with our Websites, including information about your equipment, browsing actions, and patterns:

- details of your visits to our Websites. This includes: browsing history, search history, location data (IP based), traffic data, logs, referring/exit pages, date and time of your visit to our Websites, error information, clickstream data, and other communication data and the resources that you access, use, or otherwise interact with on the Websites; and
- other information necessary to provide you with our products and services; and
- information about your computer and internet connection, i.e., your IP address, operating system, and browser type.

The information we collect automatically may include Personal Data, or we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties. It helps us to improve our Websites and to deliver a better and more personalized service by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences;
- customize our Websites according to your individual interests;
- speed up your searches; and
- recognize you when you return to our Websites.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. Our Websites may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Websites. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you do not consent to our use of cookies or select this setting you may be unable to access certain parts of our Websites. You can find more information about cookies at <http://www.allaboutcookies.org> and <http://youonlinechoices.eu>.

- **Session Cookies.** Our use of cookies also includes “session cookies.” Each time you access the Websites, a session cookie containing an encrypted, unique identifier is placed on your browser. These session cookies allow us to uniquely identify you when you use the Websites and track which pages of the Websites you access. Session cookies are required to use the Websites.
- **Web Beacons.** Pages of our Websites and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Zeman Homes, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Websites are served by third-parties, including advertisers, ad networks and servers, content providers, analytics providers, social media companies, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Websites. The information they collect may be associated with your Personal Data or they may collect information, including Personal Data, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. In particular, our Tenant Web Access/Resident Portal is provided by Rent Manager. Rent Manager’s privacy notice can be found here: <https://www.rentmanager.com/privacy-statement/>.

For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

Information We Create About You

We may also create certain information about you. When we associate this information with other Personal Data about you, we consider this information to be Personal Data. This information includes: unique identifiers (such as a customer ID), records of goods and services (including homes or facilities in RV Resort communities) purchased, obtained, rented, or considered to be purchased, obtained, or rented, monthly rent or mortgage amounts and associated payment history.

Information We Collect from Third Parties

We may collect Personal Data from third parties, including as part of a credit check. When we associate this information with other Personal Data about you, we consider this information to be Personal Data. This information includes: real name, alias, current and prior home/work postal address, unique personal identifier, home/work email address, home/work telephone number, drivers’ license or other state-issued ID number, passport number, credit or debit card number,

financial information, insurance information, title, employer name, employment history, credit history, credit score, other background check information.

4. How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Data:

- to provide and personalize our Websites and its content to you;
- to provide you with information, products, or services that you request from us;
- to process your requests;
- to support, develop, troubleshoot, and debug our Websites;
- to create, maintain, customize, and secure your account with us;
- to process your requests, transactions, and payments and prevent transactional fraud;
- to provide you with notices about your account and property that you may buy or rent from us at our communities;
- to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- to help maintain the safety, security, and integrity of our Websites, databases and other technology assets, and business;
- to help maintain the safety, security, and integrity of our communities;
- for internal testing, research, analysis, and product development, including to develop and improve our Websites, and to develop, improve, or demonstrate our products and services;
- debugging to identify and repair errors that impair existing intended functionality;
- to notify you about changes to our Websites or any products or services we offer or provide through them;
- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activities, and prosecuting those responsible for that activity;
- to allow you to participate in interactive features on our Websites;
- in any other way we may describe when you provide the information;
- to fulfill any other purpose for which you provide it; and
- for any other purpose with your consent.

We may also use your Personal Information to contact you about our goods and services that may be of interest to you. If you do not want us to use your information in this way, please send us an email stating your request at privacy@zemanhomes.com. For more information, see [Choices About How We Use and Disclose Your Information](#).

5. Disclosure of Your Information

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Notice. However, we may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this Privacy Notice:

- to our subsidiaries and affiliates;
- to contractors, service providers, and other third-parties we use to support our business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. These entities provide IT support services, rental and purchase screening services, and credit check services. Our payment processors' privacy policies may be found at <https://intellipay.com/privacy-policy/>. Our tenant portal is provided by a third party, whose privacy notice may be found at <https://www.rentmanager.com/privacy-statement/>.
- to a potential or actual buyer or other successor in the event of a planned or actual merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Zeman Homes' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Zeman Homes about our Websites' users is among the assets transferred;
- to fulfill the purpose for which you provide it. For example, if you provide us an email address as an emergency contact or as a contact for someone staying with you at one of our communities, we will use that email address to contact that individual when appropriate;
- for any other purpose disclosed by us when you provide the information; and
- with your consent.

We may also disclose your Personal Data:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our Terms of Use and other agreements, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Zeman Homes, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

6. Choices About How We Use and Disclose Your Information

We do not control the collection and use of your information collected by third parties described above in [Disclosure of Your Information](#). When possible, these organizations are under contractual obligations to use this data only for providing the services to us and to maintain this

information strictly confidential. These third parties may, however, aggregate the information they collect with information from their other customers for their own purposes.

In addition, we strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Websites may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can learn more about interest-based advertisements and your opt-out rights and options from members of the Network Advertising Initiative (“NAI”) on its website (www.networkadvertising.org) and from members of the Digital Advertising Alliance on its website (www.aboutads.info).

7. Accessing, Correcting, and Deleting Your Personal Data

You can review and change some of your Personal Data by logging into the tenant portal and visiting your account profile screening page.

You may also send us an email at privacy@zemanhomes.com to request access to, correct or delete any Personal Data that we have collected about you. We cannot delete your Personal Data except by also deleting your user account. We may not accommodate a request to change or delete information if we believe the change or deletion would violate any law or legal requirement or cause the information to be incomplete or incorrect.

8. Do Not Track Signals

We also may use automated data collection technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. At this time, we do not honor such signals and we do not modify what information we collect or how we use that information based upon whether such a signal is broadcast or received by us.

9. Data Security

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites, you are responsible for keeping this password confidential.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Websites. Any transmission of Personal Data is at your own

risk. We are not responsible for circumvention of any privacy settings or security measures deployed on the Websites.

10. Consent to Processing of Personal Data in the United States

In order to provide our Websites, products, and services to you, we may send and store your Personal Data outside of the country where you reside or are located, including to countries that may not or do not provide an equivalent level of protection for your Personal Data. Your Personal Data may be processed and stored in the United States and federal, state, and local governments, courts, or law enforcement or regulatory agencies in the United States may be able to obtain disclosure of your information through the laws of the United States. By using our Websites, you represent that you have read and understood the above and hereby consent to the storage and processing of Personal Data outside the country where you reside or are located, including in the United States.

Your Personal Data is transferred by Zeman Homes to another country only if it is required or permitted under applicable data protection law and provided that there are appropriate safeguards in place to protect your Personal Data. To ensure your Personal Data is treated in accordance with this Privacy Notice when we transfer it to a third party, Zeman Homes uses Data Protection Agreements or equivalent clauses between Zeman Homes and all other recipients of your Personal Data.

11. Changes to Our Privacy Notice

We may change this Privacy Notice at any time. It is our policy to post any changes we make to our Privacy Notice on this page. If we make material changes to how we treat our users' Personal Data, we will notify you through a notice on the Websites' home page. The date this Privacy Notice was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Websites and this Privacy Notice to check for any changes.

YOUR CONTINUED USE OF OUR WEBSITES FOLLOWING THE POSTING OF CHANGES CONSTITUTES YOUR ACCEPTANCE TO SUCH CHANGES.

12. Contact Information

If you have any questions, concerns, complaints, or suggestions regarding our Privacy Notice or the ways in which we collect and use your Personal Data described in this Privacy Notice, have any requests related to your Personal Data pursuant to applicable laws, or otherwise need to contact us, you may contact us at the contact information below or through the "Contact" page on our Websites.

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