### **PRIVACY POLICY**

Effective July 1, 2018.

C&S Enterprises ("we," "us", "our"), through our website www.candsapartments.com (the "Site"), respects the sensitive nature of any personal information you provide to us. We have created this Privacy Policy to demonstrate our commitment to the privacy of those who visit our Site. The services provided by our Site are referred to as our "Services." This Privacy Policy describes our information collection, storage and disclosure practices and the choices you have regarding how your personal information is collected and used by us and third parties who assist us in providing Services.

Residents of the European Economic Area ("EEA"), which includes the member states of the European Union ("EU"), should consult the sections of this policy relating to the "Rights of EEA Residents" and "International Data Transfers" for provisions that may apply to them.

We reserve the right to change this Privacy Policy at any time. In the event we make changes to this Privacy Policy, such policy will be re-posted in the "Privacy" section of our Site with the date such modifications were made indicated on the top of the page or we may contact you to inform you about the revisions with a link to the revised Privacy Policy. All changes are effective on the date listed at the top of this page and will apply to all information that we have about you. Your continued use of the Site or the Services after any change is posted indicates your acceptance of the changes and your continued consent to our processing of your personal data. If at any point you do not agree to any portion of the Privacy Policy then in effect you should immediately stop using the Services. You may also unsubscribe or opt-out from certain communications by following the procedures set forth in this Privacy Policy, including the section below on "Notifications and Communications from Our Websites/Opt-Out Rights."

Because this Privacy Policy contains legal obligations we encourage you to review this Privacy Policy carefully. If you have any questions concerning this Privacy Policy or our information collection, storage and disclosure practices, please contact us at Candsapartments@gmail.com or mail us at C&S Enterprises, P.O. Box 69529, Los Angeles, California 90069-0526.

### **Information We Collect**

We may collect personal data about you when you visit the Site, register on the Site or avail yourself of our Services. "Personal Data" is information that may be used to directly or indirectly identify you, including your name, e-mail address, physical address, phone number or other information about you. The majority of such Personal Data is collected when you submit information about yourself to us to register for an account or provide information to the contacts listed on the website. Some of the Personal Data that we collect is required if you wish to partake in the Services that we provide, including submitting information for repairs.

### **Personal Data**

You provide Personal Data to use the Services. We use this data to: (i) register you for an account; (ii) contact you; (iii) transmit your information to property managers; (iv) guard against potential fraud; (v) add you to our mailing list; and (vi) provide answers to your inquiries or questions.

## Non-Identifiable Data and Aggregated Personal Data

Regardless of whether you submit information to us, we and third parties performing services for us may send one or more "cookies" to your computer when you visit the Sites. Cookies are small text files placed on your web browser when you visit our Site that store information on your computer, such as your Site preferences. We use cookies when you sign in to keep track of your personal session. We also use cookies to track your activity on the Site as a unique person. For security purposes, all of this information is stored in encrypted form.

You can set your web browser to inform you when cookies are set, or to prevent cookies from being set altogether. Please note, however, that if you decline to use cookies, you may experience reduced functionality and slower site response times.

We or our service providers may also collect web surfing data related to your use of the Site. Such information may include: your Internet Protocol (IP) address, browser type, and internet service provider (ISP); your operating system; which of our web pages you access and how frequently you access them; referral or exit pages; click stream data; and the dates and times that you visit the Site. This data may be collected using cookies, web beacons, page tags or similar tools. As with cookies, the web surfing information is anonymous, "click stream" transactional data that is not associated with any users as individuals.

Web surfing data and similar information may be aggregated for administrative purposes. We may, for example, use this aggregated information in the administration of the Site to improve its usability and to evaluate the success of marketing and advertising campaigns, search engine optimization strategies, operation and effectiveness of pages on our website, and other marketing activities. We also use it to help optimize the Site based on the needs of our users.

How and When Your Information Is Shared With Other Parties

We may share your Personal Data with the building managers listed on the Site for the purposes of requesting repairs and other functions related to the Services (but not for marketing purposes). We do not share your Personal Data with any other third party.

Additional Sharing of Information

We may engage third parties to help us carry out certain other internal functions.

We may share your Personal Data with law enforcement or other government agencies as required by law or for the purposes of limiting fraud. We reserve the right to disclose your Personal Data when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order or legal process. We further reserve the right to disclose any of your Personal Data that we believe, in good faith, appropriate or necessary to take precautions against liability, to investigate and defend against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of the Site or our services, or to protect the rights, property or personal safety of us, our users, issuers, or others.

We will not share your Personal Data if such sharing is prohibited by applicable privacy and data protection law, including, without limitation, the EEA's General Data Protection Regulation effective May 25, 2018.

#### **EEA Residents**

This section of the Privacy Policy is applicable to residents of the European Economic Area ("EEA"). The EEA consists of the member states of the European Union, i.e., Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the United Kingdom, and Iceland, Liechtenstein, and Norway. This section also applies to residents of Switzerland and, in the event of its departure from the EU, residents of the United Kingdom. Residents of the EEA and Switzerland are referred to here as "EEA Residents."

From May 25, 2018, all processing of Personal Data of EEA Residents is performed by us in accordance with the General Data Protection Regulation (2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of Personal Data and on the free movement of such data ("GDPR").

Under the GDPR, we are both the controller and a co-processor of the Personal Data of EEA Residents. Our purpose for collecting and processing Personal Data from EEA Residents is to allow you to register for an account or to allow you to contact us or our property managers. The legal basis for collecting Personal Data is to fulfill these purposes. We also rely on your consent to obtain Services from us. You may withdraw consent from receiving marketing and promotional communications by contacting us at Candsapartments@gmail.com. If EEA Residents do not provide Personal Data to us or withdraw consent for processing such Personal Data, we may not be able to provide such residents with information regarding our Services or allow you to contact property managers.

EEA Residents may obtain information about the Personal Data that we hold about them by contacting us at Candsapartments@gmail.com.

#### **International Data Transfers**

If you are resident outside the United States, including in the EEA, we transfer Personal Data provided by you for processing in the United States. Under the GDPR, we are considered a "controller" and a "co-processor" of the Personal Data of EEA Residents. By providing Personal Data to us for registering for an account or for the purpose of obtaining Services, you consent to the processing of such data in the United States. The transfer of your Personal Data to the United States is necessary for the performance of a request or contract between you and us for registering or obtaining Services.

Please note that the United States does not have data protection laws equivalent to those in the EEA and other jurisdictions.

## Notifications and Communications from Our Website/Opt-Out Rights

## **Communications Regarding Our Services**

We may send you email notifications and free newsletters from time to time. Some notifications are communications relating to us and our Services. You may "opt-out" from receiving such communications by following the "Unsubscribe" instructions provided in the e-mail.

## **Legal or Security Communications**

We also send out notices that are required for legal or security purposes. For example, certain notifications are sent for your own protection. In other cases, these notifications involve changes to various legal agreements, such as the Privacy Policy or Terms of Service. Generally, you may not opt out of such emails.

### **Account and Order Communications**

If you make register for an Event with us we may send you confirmations of the registration and updates as to the status of the Event. Generally, you may not opt out of such emails.

## **Deleting Your Information**

If you want us to delete your Personal Data and your account, please contact us at with your request. We will take steps to delete your information as soon as we can, but some information may remain in archived/backup copies for our records or as otherwise required by law.

## **Personal Data Retention**

We retain the Personal Data we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our

Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws

#### **Links to Other Sites**

If you follow any links that direct you away from the Site, this Privacy Policy will not apply to your activity on the other Sites you visit. We do not control the privacy policies or the privacy practices of any third parties.

#### **Social Networks**

If you choose to connect to our Site through a third-party social network such as Facebook, Twitter, Instagram and other networks (each, a "Social Network"), we may collect Personal Data from your profile on such Social Network, such as your name, user name, and e-mail address. In addition, our Sites may offer features that will allow you to share information from our Sites to a Social Network or share information from our Social Network sites. If you decide to use such features, they may allow the sharing and collection of information both to and from such Social Network so you should check the privacy policy of each Social Network before using such features.

### **Security Policy**

We limit access to the Personal Data we have about you to those employees who have a legitimate business need to access such information. We take commercially reasonable steps to protect our customers' Personal Data against unauthorized disclosure or loss. However, no data transmission over the Internet can be guaranteed to be 100% secure. Therefore, while we strive to protect user information we cannot ensure or warrant the security of any information you transmit to us or from the Site. You engage in such transmissions at your risk.

If you believe your Personal Data is being improperly used by us or any third party, please immediately notify us via email at Candsapartments@gmail.com.

#### **Children Under 13**

Our Sites are restricted to the use of adults over the age of majority in their place of residence. No portion of the Sites is directed to children under the age of 13. Consequently, we do not knowingly collect personal identifying information from any person we know is a child under the age of 13. In the event that we learn that we have collected personal information from a child under age 13 we will delete that information as quickly as possible. If you are a parent or guardian of a child under 13 years of age and you believe your child has provided us with Personal Information, please contact us at Candsapartments@gmail.com.

#### **Do Not Track**

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Although some browsers currently offer a "do not track ('DNT') option," no common industry standard for DNT exists. We therefore do not currently commit to responding to browsers' DNT signals.

## **Your California Privacy Rights**

Under certain circumstances, California Civil Code Section 1798.83 states that, upon receipt of a request by a California customer, a business may be required to provide information regarding how that business has shared personal information of customers with third parties for direct marketing purposes. This provision is not applicable to us because we do not share your Personal Data for marketing purposes.

# Your Rights and Obligations

We ask that you keep the Personal Data that you provide to us current and that you correct any information you have provided us by contacting us at Candsapartments@gmail.com. You represent and warrant that all Personal Data you provide us is true and correct and relates to you and not to any other person.

If you are a resident of the EEA and wish to access or correct the Personal Data that we have about you or have any questions relating to the processing of your Personal Data, please contact us at Candsapartments@gmail.com with the subject line "GDPR Data."

If you use the Site, you are responsible for maintaining the confidentiality of your account and for restricting access to your computer or device, and you agree to accept responsibility for all activities that occur under your account.

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