

**TAILWIND GROUP, INC.**  
**PRIVACY POLICY**  
**SEPTEMBER 1, 2024**

Tailwind Group, Inc. and its affiliates (referred to herein as “Tailwind Group”, “we”, “us”, or “our”), recognize the importance of protecting the privacy of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or device (“Personal Information”), particularly our consumers or users (referred to as “you” or “your” in this Privacy Policy).

This Privacy Policy applies to information we process:

- Through the Tailwind Group websites operated by Tailwind Group and its affiliates;
- Through other websites and online services that we own, operate, or make available and that link to this Privacy Policy;
- When you apply or rent at one of our properties, or through other offline interactions (on-site property visits);
- Through other general inquiries we receive (including postal mail, electronic mail, telephone requests, and in person);
- If you are an Investor, please visit our Investor Portal for more information about how we handle your Personal Information; and
- If you are a Job Applicant, please visit our Employee Portal for more information about how we handle your Personal Information.

Collectively, we refer to these websites, online services, property visits and offline interactions as “services.” This Privacy Policy describes what Personal Information we process, how and where we process it, why we process it, how and when we share it, business transitions, your privacy preferences and rights, how we secure it, retention, children’s privacy, profiling and automated decision-making, location-specific disclosures, controller and data processors, updates, and contact information. If you are asked to submit registration details via this site, you may be requested to agree to additional terms regarding our use of your

Personal Information, and those additional terms will apply in that context. Any additional terms will be provided for your review at the time of registration.

## **TYPES OF PERSONAL INFORMATION**

To provide you services, we process, or you may choose to provide Personal Information that may identify you or relate to you as an individual.

Depending upon the type of relationship you have with Tailwind Group and subject to applicable laws, we may process the Personal Information described in general terms below.

- **Contact Information** such as name, postal address, email address, date of birth, picture, and emergency contact details.
- **Other Personal Identifiers** such as user/account name, Social Security number, taxpayer identification number, driver's license number, passport number, identity card or student card, and resident identification number.
- **Financial and Insurance Information** such as bank account/credit card number, rent payment details, insurance policy number, credit history, sanctions and Politically Exposed Persons ("PEP") screening results, and other financial or tax documentation.
- **Demographic Information** such as age, race, color, ancestry, national origin, citizenship, marital status, sex, veteran or military status, in each case subject to applicable laws. In certain jurisdictions, you may also choose to share with us any disabilities or other health-related restrictions so that we can provide you with adequate accommodations.
- **Commercial Information** such as records of products or services purchased, obtained, or considered, other purchasing histories or tendencies, utility bills, insurance claimant name and contact information, lease information, rental history, rent amount, and information related to your rental such as pet and vehicle information (year, make, model).
- **App, browser, and device Information** such as the device model, software version and other device characteristics, mobile app identifiers such as Session ID and Customer ID, browsing history, search history, internet protocol address, cookie identification

number, information regarding consumer's interaction with a website, and internet postings. For more information, please review the Cookies and Other Tracking Technologies section.

- **Sensory data** such as pictures, videos, and sounds, including photos when submitting a maintenance request which, if you are using the mobile app, may require you to permit us access to your device's camera.
- **Employment or other professional information** such as education, employment history, job title, university or school attended, diploma, other CV information, pay history, and income.
- **Environmental, Social, Governance (ESG)** such as monitoring and reporting on energy usage both at site levels and within individual tenancies.

Where Personal Information is considered sensitive or special categories of Personal Information ("**Sensitive Personal Information**") under applicable laws, we will follow all applicable requirements with respect to such Sensitive Personal Information.

## **PROCESSING YOUR PERSONAL INFORMATION**

We may process Personal Information through the following:

- **Online Services.** We process Personal Information when you interact with our online services which may include, but are not limited to, searching for an apartment, communicating with us, applying for a job, posting to social media pages, or participating in a survey.
- **Mobile Application.** We process Personal Information when you use the mobile app which includes creating and updating your account, in providing resident services such as maintenance, and when ensuring the mobile app is performing as expected.
- **Property Owners.** We process Personal Information from the owners of the properties we manage.
- **Property Visits and Offline Interactions.** We process your Personal Information when you visit our properties, attend events hosted at our properties, and/or inquire about housing directly with our properties.
- **Other Sites and Third Parties.** We may use separate sites for the processing of rental applications and agreements and to assist our residents and service providers with other tasks which are

required or helpful to them, such as paying rent online. We may also receive information about you from third parties. For example, if you are on another website and you opt-in to receive information from us, that website will forward us your email address and other information about you so that we may contact you as requested and in accordance with applicable law.

- **Due Diligence.** When you provide services to Tailwind Group as a third-party vendor/contractor, we will process certain information through our discussions with you, from documents that you may deliver to us, and in the ordinary course of our business relationship.
- **Other Sources.** We process Personal Information from other sources, such as public databases or credit agencies.

Where legally required, we will obtain your consent before collecting, processing, or transferring your Personal Information and/or Sensitive Personal Information. Otherwise, we will take your receipt of this policy and your provision of Personal Information as consent.

## **COOKIES AND OTHER TRACKING TECHNOLOGIES**

We may also process “Other Data” that generally does not reveal your specific identity or does not directly relate to an individual. To the extent Other Data reveals your specific identity or relate to an individual, we will treat Other Data as Personal Information. Other Data includes:

- **Your browser or device.** We process certain data through your browser or automatically through your device, such as your operating system name and version, device manufacturer and model, language, internet browser type and version, and the name and version of the online services (such as the apps) you are using. We use this data to ensure that the online services function properly.
- **IP Address.** We process your Internet Protocol (IP) address which is a number that is automatically assigned to your computer whenever you are using the Internet. Web servers, the main computers that serve up web pages, automatically identify your computer by its IP address. As permitted under applicable law, Tailwind Group processes IP addresses for the purposes of system administration, gathering and analyzing aggregated information,

creating a better experience for users and auditing the use of our sites. We do not normally link IP addresses to anything personally identifiable, which means that your session will be logged, but you remain anonymous to us. We may seek to link your IP address to your identity when we feel it is necessary to protect our sites and other users from harm and to prevent criminal misconduct.

- **Aggregated Data.** We may aggregate data that we process, and this aggregated data will not personally identify you or any other user.
- **Cookies, Pixels, and other similar technologies.** We process certain data from cookies, pixel tags, web beacons, and other technologies (“Cookies”) which are pieces of data stored directly on your device or browser and may, in certain jurisdictions, be considered Personal Information. Cookies may be set by us and called first-party cookies. We also use third party cookies for our advertising and marketing efforts, to measure the success of our marketing campaigns, and to compile statistics about usage of the online services. Information about how you interact with our website, including clicks on links, videos, and other features available through our website, may be disclosed to third parties as part of our ordinary course of business. See the section on **PROFILING AND AUTOMATED DECISION-MAKING** below.
- **Strictly Necessary Cookies** are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not work.
- **Performance Cookies** allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies process is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance.
- **Functional Cookies** enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages.

If you do not allow these cookies, then some or all of these services may not function properly.

- **Targeting Cookies** may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. These work by uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.
- **Social Media Cookies** are set by a range of social media services that we have added to the site to enable you to share our content with your friends and networks. They are capable of tracking your browser across other sites and building up a profile of your interests. This may impact the content and messages you see on other websites you visit. If you do not allow these cookies, you may not be able to use or see these sharing tools.

Most browsers are set up to accept cookies. If you want to change your cookie preferences, you can do so through your browser settings or by updating your cookie preferences via our cookie banner, where applicable, when you enter any of our websites.

## WHY WE USE YOUR PERSONAL INFORMATION

PURPOSE	DESCRIPTION OF ACTIVITIES	LEGAL BASIS
Engage with prospective residents	The activities associated with this purpose may include providing property tours and contacting prospective residents.	Legitimate interests for leasing an apartment, for example, communication regarding your property preferences.
Applications and Contracts	The activities associated with this purpose may include collecting and processing applications or contracts and communicating with you regarding your application or account. Personal Information will be used to perform	Performance of a contract to initiate a lease or an employment relationship.  Legitimate interests for ensuring prospective residents are financially solvent.

	credit checks, background checks, or other screenings as necessary.	Legal obligations, such as sanctions screenings, background checks, anti-money laundering screenings, and identity confirmation.  Exercise of rights in judicial, administrative or arbitration procedures.
Operations and General Business	The activities associated with this purpose may include processing or communicating with residents about payments, performing debt collection, providing maintenance or other on-site services, and managing the property. Processing this information also helps us better understand how we can help prospective and current residents.	Performance of a contract to fulfill your lease.  Legal obligations relating to financial transactions, such as the obligation to maintain books and records.  Exercise of rights in judicial, administrative or arbitration procedures.
Marketing and Surveys	The activities associated with this purpose may include communicating with you about our properties and promotions and conducting resident surveys about your experience.	Consent, such as honoring communication preferences.  Legitimate interests, such as providing advertisements for our similar products and services.
Security and Legal Obligations	The activities associated with this purpose may include detecting	Legitimate interests to protect against malicious activity.

	security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, as well as ensuring the safety of our residents.	Legal obligations relating to data protection and to report illegal activity and security incidents.
Environmental, Social, and Governance (ESG) Initiatives	The activities associated with this purpose may include monitoring and reporting on energy usage both at site levels and within individual tenancies.	Legal obligations relating to climate change and carbon reduction initiatives.  Legitimate business in conjunction with ESG initiatives.

**SHARING YOUR PERSONAL INFORMATION**

We may share Personal Information with the following third parties to provide you services, following a specific request from you, or to fulfill our legal obligations.

- **Tailwind Group Affiliates.** We disclose your Personal Information and Other Data with our affiliated companies as necessary to communicate with you, provide you services, fulfill our contract with you and to accomplish our business purposes.
- **Service Providers.** We disclose Personal Information and Other Data to third parties who perform services such as hosting our websites, providing our information technology systems, supporting outsourcing arrangements, processing payments, conducting research and analytics, providing on-site services, providing benefits, conducting financial, identity and other legal checks and providing professional advice. Some of these service providers may use your Personal Information for their own purposes and legal obligations, and where this is the case, these service providers are therefore considered separate data controllers.
- **Property Owners.** We disclose Personal Information to the Owners of the properties we manage. Owners may use your Personal Information for their own purposes and legal obligations

and are therefore considered separate data controllers for multiple processes during your tenancy journey.

- **Property Managers.** We disclose your Personal Information to managers who assist us with the management of your property and/or who may take over management responsibilities from us.
- We disclose Personal Information and Other Data to our advertising partners or to sponsors of events and promotions in which you have expressed interest or for which you have registered.
- **Government Authorities.** We disclose Personal Information and Other Data to government authorities in accordance with applicable laws.

We may also use and disclose your Personal Information as necessary to comply with applicable laws, respond to requests or requirements from government authorities, enforce our terms and conditions, or to otherwise protect the rights, property, or safety of Tailwind Group employees, residents and other persons, including exchanging information with third parties for fraud protection and credit risk reduction.

## **BUSINESS TRANSITIONS**

If Tailwind Group goes through a business transition, such as a merger, being acquired by another company, or selling all or part of its assets, including an individual property, Personal Information may be transferred as part of that transition. By using our websites and providing your Personal Information, you consent to this transfer, provided use of the Personal Information will remain in accordance with the Privacy Policy in place at the time of the transfer. If required by law, we will separately notify you of such transfer.

## **YOUR PRIVACY PREFERENCES AND RIGHTS**

We provide you with options, information, and choices as required under applicable law to express your preferences.

### **EMAIL CONSENT AN OPT-OUT**

Each of our commercial emails contain a link with instructions on how to remove yourself from our email list. Please note that if you are a

resident of a Tailwind Group property and you use this site and your property site, you will need to opt-out of your property site separately. You will also need to opt-out separately from any third-party sites you have registered with. If you opt out of receiving marketing messages, we will continue to send you transactional messages. These include answers to your questions. If your request has not been duly answered, or you have further doubts, you can contact us via email at: [marketing@thetailwindgroup.com](mailto:marketing@thetailwindgroup.com)

## **SECURING INFORMATION**

We cannot guarantee the security of any Personal Information you disclose online and therefore you must be aware of this risk.

## **RETENTION**

We will retain your Personal Information for the period we believe reasonable to fulfill the purposes for which we hold it, as outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

## **CHILDREN'S PRIVACY**

Our websites are not directed at children. We do not process or maintain information at our sites from those who are considered children in the jurisdiction in which they reside. We do not permit children under 16 years of age (or such higher age specified by applicable law) to become registered users of our sites. By using any of our sites, you represent that you are not under 16 years of age (or such higher age specified by applicable law). If we detect that you do not meet these age requirements, we may block and/or delete the Personal Information that you provided.

If you are a parent or guardian and you believe that your child does not meet these age requirements, **please contact us using the information in the "Contact Information" section.**

## **PROFILING AND AUTOMATED DECISION-MAKING**

In certain circumstances and subject to applicable law, we may use automatic decision-making to evaluate your credit against our required

criteria. Credit-checking may be a step in our application review process.

In certain circumstances and subject to applicable law, we will use automated means to conduct sanctions and PEP screenings and in some cases for background checks. This processing is in accordance with our legal obligations and legitimate interests and has meaningful human intervention before making final decisions that may impact your application.

We may also use third parties to serve tailored advertisements that may interest you. To serve these advertisements, those third parties place a cookie or other tracking technology on your browser to profile your access and use of our online services.

## **CONTACT INFORMATION**

If you have any questions about this Privacy Policy or have complaints about the processing of your Personal Information, please contact us at [marketing@thetailwindgroup.com](mailto:marketing@thetailwindgroup.com).

You may also contact us by postal mail at the following address:

Tailwind Group, Inc.  
Attn: Data Privacy  
530 S. Front Street, Suite 100  
Mankato, MN 56001