

Sunset Bay Association Privacy Policy

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1. SCOPE

This privacy policy (“**Policy**”) explains how we process personal data from members, non-members and visitors to our website (“**Site**”) and users of our products and services (“**Services**”) as a controller or business under applicable privacy laws.

This Policy does not apply to the personal data of employees or job applicants or to information that is exempt under applicable laws. We may provide additional notices when needed to clarify our privacy practices in specific circumstances.

2. PERSONAL DATA WE COLLECT

While the personal data we collect varies depending upon your use of our Services and our interactions with you, we may collect personal data from you, from third-party sources, and automatically:

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Personal Data Collected Directly from You. We may collect the following personal data from you:

- **Account Services.** When you register or create an account, we may collect your and your co-owners name, email address, mailing address, property information, phone number, organization name, job title and primary role, account name and password.
- **Member Services.** We collect user-generated content when you submit an idea or sign up for our Services such as garbage collection services, legacy bricks, volunteer work or other Services.
- **Communications.** We collect the information you provide such as contact information and records of our communications.
- **Transaction and Billing Information.** When you purchase a product or Service from us, we collect purchase information, including payment card information through a third-party processor.
- **Surveys and Votes.** When you fill out a survey or to cast a vote, we collect your response, which depends on the type of survey or vote, but may include selection of board members, approval of financials and spending, opinions on issues, satisfaction with a product or Service, or other.
- **Events and Other Information.** We collect personal data related to your registration for and participation in our events.
- **Other Information.** We may collect other personal data that you consent to or would reasonably expect based on the nature of the circumstances.

Personal Data Collected from Third Parties. We may collect personal data about you from third party sources such as public databases, advisors and agents, government entities and law enforcement, business partners, business customers, clients, social media platforms, or other third parties.

- We may receive lead and prospect information from third parties about prospective members that may be interested in our Services. We may also engage with third parties to enhance or update our customer information.
- If you post information about us or engage with us on third party platforms or choose to link your Company account to or log in to our Services with a third-party account (e.g., Facebook or LinkedIn), we may collect personal data about you from that third party platform or account.
- These third-party platforms and services control the information they collect and share about you. For information about how they may use and disclose your information, including any information you make public, please consult their respective privacy policies.

Personal Data Collected Automatically. When you visit our Sites or Services, we and third parties may collect information, including personal data, including through the use of cookies, pixel tags, and other similar technologies such as:

- **Activities and Usage.** We collect activity information related to your use of the Site, such as information about subscription information, emails read, links clicked, login information, profile creation and change information, membership searches

conducted, features used, items viewed, time spent on certain pages, your interactions with us, log file information, and other activity and usage information.

- **Membership Information.** We collect or derive membership information such as membership level, status, start and change dates, details to show other members, renewal information, balances owed, invoice and payment information, donations made and notes made when processing payments.

3. HOW WE USE PERSONAL DATA

Generally, we use personal data for the following purposes:

- **Providing Services and Support.** To provide and operate our Services, communicate with you about your use of the Services, provide problem resolution and support, respond to your inquiries, fulfill your orders and requests, process your payments, and for similar service and support purposes.
- **Communications.** To send you information about our Services, to seek your views or comments, to send you communications that may interest you and any other information that you sign up to receive to send you communications which you have requested, to respond to your questions or requests and to fulfill your orders.
- **Planning and Managing Meeting and Events.** For meeting and event planning and management, including meeting and event notifications and reminders, registration, attendance and connecting you with other event attendees.
- **Voting and Surveys.** To administer surveys and questionnaires, such as for membership voting, financial approvals, opinions on issues, research, or customer satisfaction purposes.
- **Marketing and Advertising.** To manage, analyze, measure and improve advertising campaigns.
- **Analytics and Improvement.** To better understand how members and others use the Services, and our other products, and for other research and analytical purposes, such as to evaluate and improve our Services and business operations, to develop our Services and features, and for internal quality control and training purposes.
- **Security and Protection of Rights.** To protect the Site and Services and our business operations; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our terms or this Policy.
- **Legal Proceedings and Obligations.** To comply with the law and our legal obligations, to respond to legal process and related to legal proceedings.
- **General Business and Operational Support.** Related to the administration of our general business, accounting, auditing, compliance, recordkeeping, and legal functions.

4. DISCLOSURES OF PERSONAL DATA

In general, we disclose and make available personal data to third parties in the following ways:

- **Corporate Affiliates.** We may disclose personal data to corporate affiliates as part of our business operations and for purposes and uses that are consistent with this Policy.
- **Processors and Service Providers.** We may disclose personal data to our service providers who perform services on our behalf such as IT service providers, financial services providers, hosting providers, etc.
- **Compliance, governance and legal requirements.** We may disclose personal data to comply with legal and compliance obligations and to respond to legal process and related to legal proceedings. For example, we may disclose personal data in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement. We may also disclose information, including personal data, related to litigation and other legal claims or proceedings, for our internal accounting, auditing, compliance, recordkeeping, and legal functions.
- **Other Disclosures.** We may disclose your personal data for other purposes, which we will notify you of and/or obtain your consent when required.

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5. COOKIES AND OTHER TRACKING MECHANISMS

We and other third parties use cookies, pixel tags, session replay technology, and other similar tracking mechanisms to automatically collect information about browsing activity, device type, and similar information within our Site and Services. This information, which may be considered personal information in some jurisdictions, is used, for example, to analyze and understand how you access, use and interact with our Site and Services; to identify and resolve bugs and errors in our Site and Services; to assess, secure, protect, optimize, and improve the performance of our Site and Services; for marketing, advertising, measurement and analytics purposes; and to personalize content on our Site and Services. We may also deidentify or aggregate such information to analyze trends, administer our Site and Services, gather broad demographic information for aggregate uses and for any other lawful purpose.

Cookies. “Cookies” are alphanumeric identifiers used for tracking purposes. Some cookies allow us to make it easier for you to navigate, while others are used to enable a faster log-in process, support the security and performance of the Site, or allow us to track activity and usage data within the Site and across websites.

Pixel Tags and Similar Technologies. Pixel tags (sometime called web beacons or clear GIFs) are tiny graphics with a unique identifier, similar in function to cookies. We may use these tracking technologies to understand users’ activities, help manage content and compile usage statistics, and in emails to let us know when they have been opened or forwarded so we can track response rates and gauge the effectiveness of our communications.

Third Party Analytics. We use third party tools, such as Google Analytics, which are operated by third party companies to evaluate usage and traffic on our Sites and Services. These third-party analytics companies use cookies, pixels, and other tracking technologies to collect usage data to provide us with reports and metrics that help analyze, improve and enhance performance and user experience. To learn more about Google’s privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google

Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

Cross-Device Tracking. We and third parties may use the information we collect about you within our Site and on other third-party websites and services to help us and these third parties identify other devices that you use (e.g., a mobile phone, tablet, other computer, etc.) to interact or engage with us or the Site.

6. SECURITY

No data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot guarantee or warrant the security of any information collected through our Site. You use our Site and provide us with your personal data at your own risk.

7. HOW LONG WE RETAIN PERSONAL DATA

Your personal data will be retained until such time as needed to fulfill the purposes and uses for which it was collected as outlined in this Policy. If you request that we delete your personal data from our databases, please note we may still retain your personal data as necessary to comply with our legal obligations, regulatory requests, resolve disputes, and enforce our agreements.

8. YOUR PRIVACY CHOICES

Marketing Communication. We may send periodic promotional and operational emails, text messages or other similar communications to you in accordance with applicable law. You may change your preferences by following the instructions provided to you in the communication. If you opt-out of receiving promotional emails from us, we may still send you communications about your account or any services you have requested or received from us. To opt-out of any text messages, reply STOP.

Industry Ad Choice Programs. You can also control how participating third-party ad companies use the information that they collect about your visits to our Site and those of third parties, in order to display more relevant targeted advertising to you. You can obtain more information and opt-out of receiving targeted ads from participating third-party ad networks as outlined below.

- U.S. Users: aboutads.info/choices (Digital Advertising Alliance).
- EU Users: youronlinechoices.eu (European Interactive Digital Advertising Alliance)
- Canada Users: youradchoices.ca/choices/ (Digital Advertising Alliance of Canada)

Cookie Settings. You can set your browser to block certain cookies or notify you when a cookie is set; you can also delete cookies. The “Help” portion of the toolbar on most browsers will tell you how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to delete cookies. Visitors to our Site who disable cookies will be able to browse the Site, but some features may not function. If you come to our Site from a different device or from a different browser on the same device, you will need to apply your cookie settings for that browser and/or device as well.



Browser Signals. To the extent required by applicable law, if our Site detects that your browser is transmitting an opt-out preference signal, such as a “global privacy control” (or GPC) signal, we will apply that signal to opt that particular browser on your device out of targeting cookies on our Site. If you come to our Site from a different device or from a different browser on the same device, you will need to apply GPC for that browser and/or device as well. We do not respond to do not track signals.

9. RESELLER ACTIVITIES/INTEGRATION PARTNERS.

In certain instances, our Services can be configured to integrate with third party solutions such as payment processors; however, we do not collect or store payment processing information. We may also provide your business contact information to our integration partners or refer customers to third parties. Our customers enter into separate agreements with these third parties that govern the processing of personal information.

10. PERSONAL DATA OF MINORS

We provide a general audience Site. The Site and Services are not designed for minors, and we do not knowingly collect personal data from minors.

11. EXTERNAL LINKS

Our Sites and Services may contain links to third-party websites or features. Any access to and use of such linked websites or features is not governed by this Policy, but instead is governed by the privacy policies of those third parties. We are not responsible for the information practices of such third parties, including their collection of your personal data. You should review the privacy policies and terms for any third parties before proceeding to those websites or using those features.

12. LEGAL GROUNDS FOR COLLECTING AND PROCESSING PERSONAL DATA

Consent. The legal ground for processing your personal data that we collect when you provide us with specific permission to do so, is your consent, which you may withdraw at any time by clicking on any unsubscribe link that we provide or by emailing sunsetbayassociation@yahoo.com.

Contractual Necessity. We may process your personal data when it is necessary in order to enter into a contract with you (e.g., if you request that we provide you a quote for potential services) or when it is necessary for the performance of a contract to which you are a party (e.g., processing credit card details in order to effect payment).

Compliance with Legal Obligations. We also may conduct certain personal data processing activities for purposes of meeting our legal obligations in the EU and in EU member states (e.g., our regulatory retention obligations).

Vital Interests. Under special circumstances (e.g., in connection with natural disasters or emergency situations), we may need to process your personal data in order to protect the vital interests of you or one or more persons.

Legitimate Interests. The last legal ground for processing the personal data that we collect for other purposes identified in the table above are Personify’s legitimate interests in providing client services; providing quality support to clients, potential clients, and Site users; providing conference, seminar, or tradeshow attendees with pertinent event information; providing clients and potential clients with marketing materials to promote our services and products; providing clients with secure sites for project collaboration and large file sharing; identifying qualified candidates to fill our open positions or available contracting opportunities; maintaining compliance with applicable global laws and regulations; providing more relevant content for users of our Sites; identifying and fixing problems with our Sites; understanding how our clients interact with our products, services, apps and websites so we can enhance the client experience and functionality of our products, services, apps and websites; and improving the overall user experience on our Sites.

13. CALIFORNIA NOTICE AT COLLECTION AND PRIVACY RIGHTS

This section of the Policy provides additional information for California residents (“**you**”) and describes our information practices pursuant to applicable California privacy laws, including the California Consumer Privacy Act and the regulations issued thereto, each as amended (the “**CCPA**”).

In this section, “**personal information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. This section does not address or apply to our handling of publicly available information or personal information that is otherwise exempt under the CCPA.

Categories of Personal Information Collected and Disclosed. The following table identifies the categories of personal information we may collect about you (and may have collected in the prior 12 months), as defined by the CCPA, as well as the categories of third parties to whom we may disclose this information for a business or commercial purpose. Depending on how you use the Services, we may collect and disclose the following categories of personal information:

Categories of Personal Information	Third Party and Other Recipient Disclosures
<p>Identifiers. Includes information regarding your name, unique personal identifier, online identifier, Internet Protocol (IP) address, postal address, phone number, and email address.</p>	<ul style="list-style-type: none"> • Advisors and agents • Affiliates and subsidiaries • Internet service providers, operating systems and platforms • Regulators, government entities and law enforcement • Data analytics providers • Marketing and advertising providers

	<ul style="list-style-type: none"> • Others as permitted by law
<p>Customer Records. Includes your name, address, phone number, and employment history. Payment information may be collected through third party payment processors.</p>	<ul style="list-style-type: none"> • Advisors and agents • Affiliates and subsidiaries • Internet service providers, operating systems and platforms • Regulators, government entities and law enforcement • Others as permitted by law
<p>Commercial Information. Includes records of personal property; records of Services purchased, obtained, or considered; or other purchasing or use histories or tendencies.</p>	<ul style="list-style-type: none"> • Advisors and agents • Affiliates and subsidiaries • Regulators, government entities and law enforcement • Data analytics providers, auditors • Others as permitted by law
<p>Internet or Other Electronic Network Activity Information. Includes browsing history, clickstream data, search history, and information regarding interactions with our Site, advertisements, or emails, including other usage data related to your use of any of our Sites or other similar online services.</p>	<ul style="list-style-type: none"> • Advisors and agents • Affiliates and subsidiaries • Regulators, government entities and law enforcement • Data analytics providers • Advertising networks • Others as permitted by law
<p>Geolocation Data. Such as general location information about a device for security and other purposes.</p>	<ul style="list-style-type: none"> • Advisors and agents • Affiliates and subsidiaries • Data analytics providers • Others as permitted by law

<p>Audio, Electronic, Visual, or Similar Information. Includes information collected via call recordings if you are interacting with us in a customer service capacity or if you call us on a recorded line and security footage if you visit our premises.</p>	<ul style="list-style-type: none"> • Advisors and agents • Affiliates and subsidiaries • Regulators, government entities and law enforcement • Others as permitted by law
<p>Professional Information. Includes professional and employment-related information such as current and former employer(s) and position(s), business contact information and professional memberships.</p>	<ul style="list-style-type: none"> • Advisors and agents • Affiliates and subsidiaries • Regulators, government entities and law enforcement • Others as permitted by law
<p>Inferences. Such as inferences drawn from any of the information described in this section about a consumer including inferences reflecting the consumer’s preferences, characteristics, behaviors, attitudes, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> • Advisors and agents • Affiliates and subsidiaries • Regulators, government entities and law enforcement • Data analytics providers • Marketing and advertising providers • Others as permitted by law

Sales and Sharing of Personal Information. The CCPA defines “sale” as disclosing or making available personal information to a third-party in exchange for monetary or other valuable consideration, and “sharing” as disclosing or making available personal information to a third-party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, we may “sell” or “share” the following categories of personal information: identifiers and Internet and network activity information. We may disclose these categories to third-party advertising networks, data analytics providers, or social networking sites for purposes of marketing and advertising and to improve and measure and analyze our ad campaigns. We do not sell or share sensitive personal information, nor do we sell or share personal information about individuals we know are under age sixteen (16).

Sources of Personal Information. We generally collect the categories of personal information in the table above from the following categories of sources: directly or indirectly from you; affiliates and subsidiaries; business partners; business customers; vendors and service providers; our Site

and online services; Internet service providers; operating systems and platforms; marketing list providers; trade show sponsors; social networks; government entities; third-party advertising networks; and marketing and data analytics providers.

Purposes of Collection, Use, and Disclosure. As further described in Section 3. How We Use Personal Data, in general, we collect and otherwise process personal information for the following business or commercial purposes and as otherwise directed or consented to by you: providing services and support; communications; analytics and improvement; customization and personalization; marketing and advertising; planning and managing events; research and surveys; security and protection of rights; legal proceedings and obligations; general business and operational support.

Retention. We retain the personal information we collect as reasonably necessary for the purposes described above or otherwise disclosed to you at the time of collection. We retain personal information as necessary to comply with our tax, accounting, operational and recordkeeping obligations, to provide you with the services you have requested, to protect, defend or establish ours and others' rights, defend against potential claims, and comply with our legal obligations. In some cases, we may deidentify or aggregate personal information in compliance with the CCPA.

California Privacy Rights. The CCPA provides California residents with specific rights regarding personal information. In general, California residents have the following rights with respect to their personal information, subject to certain conditions and exceptions:

- **Right to Know.** You have the right to request: (i) the categories or personal information we collected about you; (ii) the categories of sources from which the personal information is collected; (iii) our business or commercial purposes for collecting, selling, or sharing personal information; (iv) the categories of third parties to whom we have disclosed personal information; and (v) a copy of the specific pieces of personal information we have collected about you.
- **Right to Delete.** You have the right to request we delete personal information we have collected from you.
- **Right to Correct.** You have the right to request that we correct inaccuracies in your personal information.
- **Right to Opt-Out of Sales and Sharing.** To exercise your right to opt-out of the "sale" or "sharing" of your personal information, please click [here](#) or use the Do Not Sell or Share My Personal Information link at the bottom of our website.

You also have the right to opt-out of "sales" and "sharing" of your personal information through the use of an opt-out preference signal. If we detect that your browser or device is transmitting an opt-out preference signal, such as the "global privacy control" or "GPC" signal, we will opt that browser or device out of cookies that result in a "sale" or "sharing" of your personal information. If you come to our website or use our services from a different device or from a different browser on the same device, you will need to opt-out or use an opt-out preference signal for that browser and/or device as well.

- **Right to Limit Use of Sensitive Personal Information.** You have the right to limit use and disclose of your sensitive personal information. We do not currently use or disclose sensitive personal information beyond the purposes authorized by the CCPA. If our practices change, we will provide this right.
- **Right to Non-Discrimination.** You have the right not to be subjected to discriminatory treatment for exercising any of the rights described in this section.

Exercising Your Rights

If you are a California resident and would like to exercise your CCPA rights, you may do so via any of the methods described below:

- Calling us collect at 512-982-4400
- Emailing us at personifyprivacy@personifycorp.com
- Writing to us at: Personify, Attn: Security Officer, 7010 Easy Wind Drive, Suite 210 Austin, Texas 78752

Verification. We will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information in order to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

Authorized Agents. You may designate someone as an authorized agent to submit requests and act on your behalf. Authorized agents will be required to provide proof of their authorization in their first communication with us and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.