# **Vesta Corporation Privacy Policy**

Last Effective Date: February 5, 2021

We respect your privacy. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it to maintain your trust in handling your private information. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, YOUR CHOICE IS TO NOT USE THIS SITE. By accessing or using this Website, you agree to this privacy policy.

This privacy policy (the "Privacy Policy" or "Policy") of VESTA CORPORATION ("Company," "we," "us," or "our") describes our privacy practices regarding personal information we collect, including from persons ("you" or "your") who access our website, <u>VestaCorp.com</u> (the "Site").

## Purpose

The purpose of this Privacy Policy is to inform you about the types of personal information we gather about you, including personal information gathered when you visit the Site, and personal information we may receive from third parties or affiliates in addition to that online information and our practices for collecting, using, maintaining, protecting and disclosing and your ability to correct, the information.

# Your Consent and Policy Changes.

PLEASE READ THIS ENTIRE PRIVACY POLICY CAREFULLY. BY USING THE SITE, YOU EXPRESSLY CONSENT, WITHOUT QUALIFICATION, TO THE COLLECTION, USE AND DISCLOSURE OF INFORMATION, INCLUDING PERSONAL INFORMATION, AS DESCRIBED IN THIS PRIVACY POLICY. Company may amend this Privacy Policy from at any time. Should the Privacy Policy be modified in any way, the new Privacy Policy will be posted to this webpage. If we make any material changes to how we treat our users' personal information we will notify you by a notice on the Site home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Site and this Privacy Policy to check for any changes.

# **Types of Information Collected**

We collect several types of information from and about users of our Site: personally identifiable information and non-personally identifiable information. Personally identifiable information is information that identifies you or can be used to identify or contact you ("Personally Identifiable Information"). We also may collect information that by itself typically cannot be used to identify or contact you, such as demographic information (e.g. age, profession or gender), browser types, domain names, internet service providers, referring/exit pages, date/time stamp, operating system, information about you such as how you use the Site and your communication preferences, and other anonymous statistical data involving the use of our Site ("Non-Personally Identifiable Information").

We do not and will not sell your Personal Information.

## **How We Use Your Information**

We use information that we collect from you only as described in this Privacy Policy, or as otherwise disclosed to you at the time of collection:

- To operate and provide you with the Site;
- To provide you with information that you request from us or to send you information about our properties and services, for example, a newsletter;
- To manage our properties, your account, and your residence;
- To fulfill orders you place with us and manage your account;
- To analyze and improve the Site; and
- For any other purpose with your consent.

# **Disclosure of Your Information**

With respect to each of the categories of data above, we may disclose your information as described in this Privacy Policy or otherwise with your consent to contractors, service providers, and other third parties we use to help operate the Site and process payments and manage the properties. We may also collect and share Personal Information with third parties to comply with legal obligations; when we believe in good faith that an applicable law requires it; at the request of governmental authorities or other third parties conducting an investigation; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of our business, third parties, visitors to our websites, or the public. We may also share Personal Information with any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

# **Use of Google Analytics and Other Technologies**

This Site uses Google Analytics (and in the future may use other similar sites or services), a web analytics service provided by Google, Inc. ("Google"), to better assist Company in understanding how the Site is used. Google Analytics will place cookies on your computer that will generate information that we select about your use of the Site, including your computer's IP address. That information will be transmitted to and stored by Google. The information will be used to evaluate consumer use of the Site, compiling reports on Site activity for Company's use, and providing other services relating to Site activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. The use of cookies by Google Analytics is covered by Google's privacy policy: <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a>.

You can choose to delete existing cookies, allow or block cookies, and set preferences for certain websites in your browser's settings. Please note you may not be able to use the full functionality of the Site if you choose to block all cookies.

## **Rights of Individuals**

Site users who wish to correct, update, change, or erase the information they submit on the Site should contact us using one of the methods listed under 'Contacting Us', further below in this policy.

If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country.

California residents may have additional personal information rights and choices. Please see Your California Privacy Rights Notice (Below) for more information.

#### Links to Other Sites and Social Media Services

We may create links to other websites that we think may be of interest to you, such as social media platforms, suppliers and other third parties. We do not endorse any other websites and services by providing such links, and our Privacy Policy applies only to your use of our Site. We are not responsible for the privacy policies of any websites and services we link to on our Site, and you should read the privacy policies of each site you visit to determine what information that site may collect about you.

#### **Data Retention**

We will retain your information for as long as your account is active or as needed for us to manage and provide our services and for our business needs. Even if we delete some or all of your personal information, we may continue to retain and use de-identified or aggregate data previously collected.

## **Data Security**

We take the security of our data and information seriously. We use reasonable organizational, technical, and administrative measures to protect data under our control. No method of transmission over the Internet, or method of electronic storage, is 100% secure. The safety and security of your information also depends on you. Where we have given (or you have created) a password for access to certain parts of our Site, you are responsible for keeping the password confidential. We ask that you not share the password with anyone. Any transmission of personal information is at your own risk, and we are not responsible for any circumvention of any privacy settings or security measures contained on the Site.

## Children

Our website is not intended for users under 18 years of age. We do not knowingly collect personally identifiable information from minors. If you are under the age of 18, please do not provide any information on this Site. We may collect Personal Information of minors, provided by parents or guardians, in connection with the application and rental of a unit, or the provision of property management services. We do not sell the Personal Information of minors.

# California Online Privacy Protection Act (CalOPPA)

CalOPPA requires us to disclose categories of Personal Information we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it, which we have explained above.

CalOPPA users have the following rights:

- Right to Know and Access You may submit a verifiable request for information regarding the: 1) categories of Personal Information we collect, use, or share; 2) purposes for which categories of Personal Information are collected or used by us; 3) categories of sources from which we collect Personal Information; and 4) specific pieces of Personal Information we have collected about you.
- Right to Equal Service We will not discriminate against you if you exercise your privacy rights.
- Right to Delete You may submit a verifiable request to close your account and we will delete Personal Information about you that we have collected.
- Right to request that a business that sells a consumer's personal data, not sell the consumer's personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

We do not sell the Personal Information of our users.

For more information about these rights, please contact us.

# Do Not Track

"Do Not Track" is a privacy preference that users can set in certain web browsers. We do not respond to browser or do not track signals.

# **Contacting Us**

If you have questions regarding this Privacy Policy or the use of information collected, please contact us at:

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Weatogue, CT 06089
info@vestacorp.com
1 (860) 325-1700