

# Privacy Policy for 10AntZone

*Updated: November 22, 2022*

This policy applies to information processed by 10AntZone in connection with operation of its online properties and in the course of providing the products and services described below. This policy describes how we collect, use, share and secure your information, and your choices regarding use, access, correction, and deletion of your information. We know privacy policies can be confusing and technical. To make this as easy as possible to read and understand, we have embedded links throughout the policy. Please click on the links to learn what the defined terms mean and to see additional information about 10AntZone's use and disclosure of that information in that context.

## Privacy Principles

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These Privacy Principles will be reviewed and updated as needed, and adopted by 10AntZone's leadership.

10AntZone uses data to help our customers conduct business and serve their customers. These Privacy Principles govern our collection, use, storage, and disclosure of Personal Information. We will keep privacy in mind as we design, build, and deliver our products and services.

1. **Transparency:** We will “say what we do and do what we say.” That means we will clearly explain:
  - a. What kinds of Personal Information we collect;
  - b. Why we are collecting Personal Information; and
  - c. How we plan to use Personal Information.
2. **Purpose Limitation/Adequacy:** Our “say what we do and do what we say” policy also means we will use and disclose Personal Information in the manner and for the purposes described.
3. **Lawful Basis:** We will process personal data for proportionate and legitimate legal purposes, in order to carry out our business or in the interests of our clients. When we interact directly with individuals, we will seek their consent to collect, use, and disclose Personal Information. We will require third-party providers of Personal Information to do so as well.
4. **Collection Limitation/Necessity:** We will only collect Personal Information that is relevant for the purposes we have explained.

5. Data Minimization: We will dispose of Personal Information when we no longer need it for the purposes we have explained.
6. Data Quality: We will take reasonable steps to ensure that Personal Information used to make important decisions about individuals is accurate and up-to-date.
7. Security: We will take reasonable steps to safeguard Personal Information.
8. Data Subject Rights: We will provide choice when possible, and honor any rights an individual may have under applicable law, including transparency, access, confirmation, deletion/erasure, opt-out, etc.
9. Sensitive Personal Data: 10AntZone will limit its processing of sensitive personal data, including information about children, in compliance with applicable law.
10. Prevention and Accountability: We will develop and comply with policies, practices, and procedures designed to implement Privacy by Design and ensure compliance with applicable law. We will educate employees and contractors about their privacy obligations and monitor their compliance with our privacy policies and privacy laws.

### **Personal Information we collect;**

10AntZone collects this information from a wide variety of sources, both on and offline, such as:

- Publicly available data sources such as directory listings
- Reputable providers of licensed data derived from public and non-public sources
- Individuals, such as survey respondents, who affirmatively agree to the data uses
- Our customers, who provide their CRM Data for our use in connection with our services
- Information collected online DIIs, Cookies, MAIDs, Statistical IDs, and other persistent third-party identifiers that do not, by themselves, identify a specific individual
- Log Data and other information created in the course of providing our products and services

### **PII**

Personally Identified Information or PII is information that directly identifies or is used to identify a specific individual, including name, address, telephone number, email address, date of birth and in specific, limited cases, government identifiers.

## **CRM**

Customer Relationship Management or "CRM" Data is the data and information associated with a company's relationship with customers throughout the customer lifecycle, and may include PII and/or Pseudonymous IDs, along with demographic, behavioral, contextual, attribute, and inferential data about their customers and prospects. CRM Data may reflect a consumer's online and/or offline interactions with a particular advertiser, publisher, or retailer. This information is usually pseudonymized for use in connection with 10AntZone's online services, meaning it cannot be used to identify you without additional data, and we use technical and organization measures to segregate the data and prevent unauthorized identification of individuals.

## **Pseudonymous IDs**

Pseudonymous IDs includes information linked to DIIs (Device Identifiable Data) such as Cookies, MAIDs (Mobile Advertising IDs), Statistical/Probabilistic IDs, IP Addresses, and other third-party identifiers, including TV identifiers. Pseudonymous IDs do not, by themselves, identify a specific individual, but can be combined with other information for that purpose.

## **Geolocation**

Geolocation Data is information about the location of an individual or device derived through IP address and/or location-based services such as GPS level latitude-longitude coordinates or Wi-Fi triangulation

## **Log Data**

Log Data is information that is collected and logged in the ordinary course of operating our business, and may include standard Internet Log Data, Event Data, and/or Service Data:

- Internet Log Data. Standard Internet Log Data includes the Internet page request that is automatically collected when you visit a website, the URL of the page requested, IP Address, browser type, browser language, configuration settings, operating system information, mobile service provider, search terms, date and time stamps, and Pseudonymous IDs such as Cookies and service specific information such as Event Data and Service Data.
- Event Data. We collect information about ads you see (advertiser ID, campaign ID), where and when you see the ad (date/time stamp, URL), and how you react to the ads you see (click, hover, convert, etc.). This information may be associated with Pseudonymous IDs such as DII and other pseudonymous data such as Log Data and Attribute Data.

This notice provides 10AntZone (the Company, we or us) privacy policy regarding the nature, purpose, use, and sharing of any Personally Identifiable Information (PII) collected via this website and information gathered through our users. Our privacy policy explains our information practices when you provide PII to us, whether collected online or offline, or when you visit us online to browse, obtain information, or conduct a transaction. PII may include: your name and your tenants names, email, mailing and/or home address, phone numbers, or other information that identifies you personally. We do not require you to register or provide personal information to visit our website.

The PII you provide on a 10AntZone website will be used only for its intended purpose. We will protect your information consistent with the principles of the [Privacy Act of 1974](#).

### **Personally Identifiable Information**

As a general rule, 10AntZone does not collect PII about you when you visit our website, unless you choose to provide such information to us. Submitting PII through our website is voluntary. By doing so, you are giving 10AntZone your permission to use the information for the stated purpose. However, not providing certain information may result in 10AntZone's inability to provide you with the service you desire.

If you choose to provide us with PII on a 10AntZone website, through such methods as completing a web form or sending us an email, we will use that information to help us provide you the information or service you have requested or to respond to your message. The information we may receive from you varies based on what you do when visiting our site.

Generally, the information requested by 10AntZone will be used to respond to your inquiry or to provide you with the service you request. When this information is requested, the

reasons for collecting it, a description of 10AntZone's intended use of the information, how to grant consent to use mandatorily provided information, and how to grant consent for other than statutorily mandated uses will be fully described in a separate customized "Privacy Notice." This customized Privacy Notice will either appear on the web page collecting the information or be accessible through a hyperlink (link) prominently displayed immediately above or below the information request.

## **Email**

Some of our programs and websites allow you to send us an email. We will use the information you provide to respond to your inquiry. We will only send you general information via email. You should be reminded that email may not necessarily be secure against interception. Therefore, we suggest that you do not send sensitive personal data (such as your Social Security number) to us via email. If your intended email communication is very sensitive, or includes information such as your bank account, credit card, or Social Security number, you submit such data through our secure web page.

Electronic mail messages that contain data, records or information may be stored and used for as part of the data collection. This means that emails you send us will be preserved and maintained for varying periods of time if those emails contain PII. Electronic messages that are not data, records or information are deleted when no longer needed.

Categories of information 10AntZone collects on its websites are further described be

We collect and store certain information about your visit and from your usage and information you provide for use in site management and data collection. We collect and comply this information because it helps us to better design our website to suit your needs and to provide services for our products. This information includes:

1. The Internet domain from which you access our website (for example, “xcompany.com” if you use a private Internet access account, or “yourschool.edu” if you connect from an educational domain);
2. The Internet Protocol (IP) address (a unique number for each computer connected to the Internet) from which you access our website;
3. The type of browser (e.g., Firefox, Internet Explorer, Chrome) used to access our site;
4. The operating system (e.g., Windows, Mac OS, Unix) used to access our site;
5. The date and time you access our site;
6. The Universal Resource Locators (URLs), or addresses, of the pages you visit;
7. Your username, if it was used to log in to the website; and
8. If you visited this website from another website, the URL of the forwarding site.
9. Information you generate or provide in order to complete or use our services.
10. Information you provide as part as the reporting services.

We may share or use the above information with our employees or representatives with a “need-to-know” in the performance of their official duties, or with site users who are identified as Landlords or property owners as way to determine a renter’s credit score or to see or understand their rental history and or background. This information is used to help us make our site more useful and product services for you.

### **Information Collected for Tracking and Customization (Cookies)**

A cookie is a small file that a website transfers to your computer to allow it to remember specific information about your session while you are connected. Your computer will only share the information in the cookie with the website that provided it, and no other website can request it. There are two types of cookies:

- **Session:** Session cookies last only as long as your web browser is open. Once you close your browser, the cookie is deleted. Websites may use session cookies for technical purposes such as to enable better navigation through the site, or to allow you to customize your preferences for interacting with the site.
- **Persistent:** Persistent cookies are saved on a user's hard drive in order to determine which users are new to the site or are returning.

If you do not wish to have session or persistent cookies stored on your machine, you can **turn cookies off** in your browser. You will still have access to all information and resources at the 10AntZone website. Be aware that disabling cookies in your browser will affect cookie usage at all other websites you visit as well.

## Security

10AntZone takes the security of all PII very seriously. We take precautions to maintain the security, confidentiality, and integrity of the information we collect at this site. Such measures include access controls designed to limit access to the information to the extent necessary to accomplish our services. We also employ various security technologies to protect the information stored on our systems. We routinely test our security measures to ensure that they remain operational and effective.

We take the following steps to secure the information we collect:

- Employ internal access controls to ensure that only personnel who have access to your information are those with a need to do so to perform their official duties.

- Train appropriate personnel on our privacy and security policies and compliance requirements.
- Perform regular backups of the information we collect online to ensure against loss.
- Use technical controls to secure the information we collect online including, but not limited to:
  - Secure Socket Layer (SSL)
  - Encryption
  - Firewalls
  - Password protections
- Periodically test our security procedures to ensure personnel and technical compliance.
- Employ external access safeguards to identify and prevent unauthorized access by outsiders that attempt to “hack” into, or cause harm to, the information contained in our systems.

We hold our other third-party providers to the same high standards that we use to ensure the security, confidentiality, and integrity of personal information they may have access to in the course of their work completed on our behalf.

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