

PRIVACY POLICY

EFFECTIVE DATE: January 1, 2018

1. **INTRODUCTION.** Aspen Place Apartments for Seniors (“us,” “we,” or “Company”) is committed to respecting the privacy rights of its customers, visitors, and other users of the Company Website (“the Site”). We created this Website Privacy Policy (“Privacy Policy”) to give you confidence as you visit and use the Site, and to demonstrate our commitment to fair information practices and the protection of privacy. This Privacy Policy is only applicable to the Site, and not to any other websites that you may be able to access from the Site, each of which may have data collection, storage, and use practices and policies that differ materially from this Privacy Policy.

2. INFORMATION COLLECTION PRACTICES

2.1. TYPES OF INFORMATION COLLECTED

2.1.1. **TRAFFIC DATA COLLECTED.** We automatically track and collect the following categories of information when you visit our Site: (1) IP addresses; (2) domain servers; (3) types of computers accessing the Site; and (4) types of web browsers used to access the Site (collectively “Traffic Data”). Traffic Data is anonymous information that does not personally identify you but is helpful for improving your experience on the Site.

2.1.2. **PERSONAL INFORMATION COLLECTED.** In order for you to complete the Contact Form that we offer via the Site, we require you to provide us with certain information that personally identifies you (“Personal Information”). Specifically, we ask for Contact Data (such as your name, and e-mail address). If you communicate with us by e-mail or otherwise complete online forms, any information provided in such communication may be collected as Personal Information.

2.2. USES OF INFORMATION COLLECTED

2.2.1. **COMPANY USE OF INFORMATION.** We may use Contact Data to send you information about our company or our products or services, or promotional materials, or to contact you when necessary.

2.2.2. **SHARING OF PERSONAL INFORMATION.** We do not share any Personal Information we collect with third parties

2.2.3. **USER CHOICE REGARDING COLLECTION, USE, AND DISTRIBUTION OF PERSONAL INFORMATION.** You may choose not to provide us with any Personal Information. In such an event, you can still access and use much of the Site; however you will not be able to access and use those portions of the Site that require your Personal Information.

3. **CONFIDENTIALITY AND SECURITY OF PERSONAL INFORMATION.** We will keep your Personal Information private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with a court order or other legal process; (b) protect our rights or property; or (c) enforce our Terms of Service.
 - 3.1. **USER ABILITY TO ACCESS, UPDATE, AND CORRECT PERSONAL INFORMATION.** We maintain a procedure in order to help you confirm that your Personal Information remains correct and up-to-date. You may modify any personal information that you have submitted by logging into your account and updating your profile information at any time.
 - 3.2. **PUBLIC INFORMATION.** The Site may contain links to other websites. We are not responsible for the privacy practices or the content of such websites.
4. **HOW WE RESPOND TO “DO NOT TRACK” DISCLOSURES.** We are strongly committed to not sharing nonpublic information with third parties. Under this Privacy Policy, we may share your information only under particular situations, as described in this Policy. Because we protect all users in this manner, we do not change our behavior in response to a web browser's “do not track” signal.
5. **UPDATES AND CHANGES TO PRIVACY POLICY.** We reserve the right, at any time and without notice, to add to, change, update, or modify this Privacy Policy, simply by posting such change, update, or modification on the Site and without any other notice to you. Any such change, update, or modification will be effective immediately upon posting on the Site.