

Privacy Statement

Last updated: June 4, 2026

SRM Development, LLC, together with its subsidiaries and affiliates, is a leader in real estate and construction in high barrier, urban markets across the western United States. To learn more about SRM, please visit [Who We Are](#).

This SRM Privacy Statement (the “**Statement**”) describes the personal information that SRM (together, “**SRM**”, “us,” “our,” and “we”) collects, stores, uses, and discloses, including personal information we collect when you use our websites, visit our properties, register for an online account to complete an application, become a resident at one of our properties, use our Wi-Fi, work or invest with us, apply for a position on our team, or engage with us on social media platforms. This Statement addresses specific disclosure requirements from various privacy laws and serves as our ‘notice at collection.’

Please read this Statement to understand how we handle your personal information and how you can exercise your privacy rights. If you have questions about our Statement, privacy practices, or any concerns regarding how we process your personal information, please contact us at privacy@srmdevelopment.com.

We use technologies on our websites and apps, such as cookies, pixels, and software development kits (SDKs), that enable third parties to collect personal information. We use that personal information for the purposes described herein, and the third parties may also use personal information for their own purposes in accordance with their respective privacy policies. Our use of these technologies, which allow third parties to collect personal information on our websites and apps, may be considered a 'sale' or 'sharing' of personal information under privacy laws in certain instances. To learn more about these third parties and how to opt out, please see Section 4, Cookies and Similar Technology below.

1. PERSONAL INFORMATION WE COLLECT AND PROCESS

We collect and process personal information of our residential applicants, residents, partners, investors, job applicants, and members of the communities we serve. The categories of personal information we collect depends on our interactions and the nature of your relationship with SRM (or our subsidiaries and affiliates).

SRM’s sources of personal information include:

- *You*. We collect information directly from you, for example, when you:
 - Apply to become a resident at one of our properties.
 - Send us a message, sign up for our newsletter, or engage with us directly on a social media platform.
 - Attend our events, drop us your business card, or do business with us.
- *Automatically Collected Information*. We collect information automatically from you using Cookies and Similar Technology when you visit our websites, use our Wi-Fi, or when you engage with our marketing emails. For example, when you visit the website of one of our residential properties, we use cookies to determine the length of your visit or the content you viewed.

- *Others.* We may collect information about you from others, including residential applicants who provide personal information of other members of their households, credit reporting agencies, social media platform operators, and public sources. For example, if you apply to become a resident at one of our properties, we may obtain employment verification from your employer.
- *Our processing.* We may make inferences about you. For example, we may draw inferences from the information we collect from and about you, such as your preferences.

We collect and process the following categories of information, depending on our relationship and the nature of our interactions:

- **Contact information and other identifiers.** We may collect your name, email address, physical address, and phone number, as well as other identifiers, including government issued IDs, when necessary. For example, for identity confirmation, we require all rental applicants to provide government-issued, photo identification. We also collect other unique identifiers, such as device identifiers and unique online identifiers, such as cookie ids.
- **Rental application and resident data.** If you submit a rental application or become a resident at an SRM property, we may process the following categories of personal information:

- *Information about your income and assets.* Every applicant must provide information about sources of income and financial assets.
- *Your rental and/or mortgage history.* We process information about your recent history of paying rent or mortgage payments.
- *Tenant Screening recommendations.* We use [RentGrow](#), a tenant screening reporting company, to obtain rental score recommendations which help us estimate the relative financial risk of leasing an apartment to you. Rental score recommendations are calculated by RentGrow using factors SRM determines and applying information it finds in your credit report and application, which may include your bill-paying history, the number and type of accounts you have, open bankruptcies, unpaid utility bills, collection actions, charge-off, repossession, eviction histories, and outstanding debt.

If your application is rejected or “conditionally accepted” with certain conditions, you have the right to obtain a free copy of your tenant screening report, which includes information about you that is furnished by one or more credit bureaus and may contain rental history, civil records, or criminal records, For more information, please visit: <https://www.rentgrow.com/>.

- *Student status.* If the property is subject to certain student limitations, we process information to verify student status.
- *Criminal history.* We process criminal background checks for all applicants and possible residents eighteen (18) years of age or older.
- *Insurance information.* If required, we may collect information about the status of personal liability or rental insurance.

- *Accommodation requests.* Applicants and residents with disabilities may request accommodations or access-related modifications; such requests may include information about the applicant's or resident's disabilities.
- *Protection requests.* If you are an applicant or resident of housing covered by The Violence Against Women Act, you may share information about why you need protections under and provide documentation showing you are a victim.
- **Demographic information.** We collect a variety of demographic information, including information about your general geographic location or market area, gender, marital status, or age. If you apply for a job, you may voluntarily provide information about your race, ethnicity, veteran status, or disability status.
- **Commercial information.** We process and collect commercial information, including property records, information about our prior agreements, leases, transactions, or deals, or information about the business opportunities or projects that interest you.
- **Professional and educational information.** We collect the current employer, job title, student status, educational background, and credentials of job or residential applicants.
- **Your preferences, interests, and affiliations.** We may collect information about your property preferences, lifestyle needs, and amenity interests, as well as community, family, or professional affiliations.
- **Communications.** We collect the content of our communications, if you send us a message via email or using social media platforms.
- **Content.** We may collect various types of content, including information and comments provided to us in surveys and written reviews, either shared with us directly or made available through online platforms.
- **Audio, video, images, and related data.** At our events, we may collect photo and videos. At our properties, we may collect video or images, and related metadata such as time stamps, of you through security devices.
- **Vehicle information.** We may collect information about your license plate number and the make and model of your car.
- **Device data.** If you use our Wi-Fi or visit us online, we may gather device information, using Cookies and Similar Technology. Such information may include data about the operating system or browser you use, technical attributes of your device, and information about your device's connection, including your IP address.
- **Internet and electronic network activity.** If you use our Wi-Fi or visit us online, we may gather:
 - The search terms you use on our website and the queries you perform, including any text or data you input into our chatbot.
 - Information about your digital preferences, including cookie settings.

- Log data and other information about our digital interactions. Using Cookies and Similar Technology, we may collect:
 - The date and time of your visit to our website and the duration of your visit,
 - The content you viewed and your clicks or interactions on our website,
 - The website from which you linked to our website, and
 - Other similar information about your use of our websites or your engagement with our emails.

To learn more about information automatically collected on our websites or when you engage with our emails, please see the Cookies and Similar Technology section below.

We may process de-identified personal information. Information in this form cannot be used to identify, infer details about, or connect to any specific person. We maintain such information in a de-identified state, and unless permitted under applicable law, we do not use de-identified data to re-identify a specific person.

Some of the information we collect, depending on our interactions, may qualify as “sensitive” personal information under data privacy laws. For example, if you submit a rental application, certain information we collect may be considered sensitive, including government issued identification and information that reveals your physical condition or status as a victim of crime. If you apply for a job with us, you may voluntarily share certain demographic information considered sensitive personal information. We collect such sensitive information for legitimate business purposes, which primarily include processing residential applications and meeting our legal obligations as an employer and housing provider.

2. HOW WE USE PERSONAL INFORMATION

We use your information for a variety of purposes, depending on our interactions and the nature of our relationship. We’ve provided the chart below to describe our uses of personal information.

Use of Personal Information	Categories of Personal Information Used for this Purpose
<p>Process residential and commercial applications and negotiate various types of property agreements. We process various categories of personal information to screen applicants and identify the right property or space for the resident.</p>	<ul style="list-style-type: none"> ● Contact information and other identifiers ● Rental application and resident data ● Demographic information ● Commercial information ● Professional and educational information ● Your preferences, interests, and affiliations ● Communications ● Content ● Vehicle information
<p>Fulfill our obligations to residents. We process personal information to process payments, fulfill service needs, provide customer support, maintain our properties, resolve disputes, and facilitate ongoing relationships with residents.</p>	<ul style="list-style-type: none"> ● Contact information and other identifiers ● Rental application and resident data ● Commercial information ● Your preferences, interests, and affiliations ● Communications ● Content ● Vehicle information

<p>Develop business, manage projects, complete transactions, and meet our contractual obligations. In the ordinary course of business, we process personal information of our vendors, partners, investors, and community leaders.</p>	<ul style="list-style-type: none"> • Contact information and other identifiers • Commercial information • Professional and educational information • Your preferences, interests, and affiliations • Communications • Content
<p>Provide, protect, and improve our websites and the digital services we provide. We use Cookies and Similar Technology to gather data that provides insights on ways to improve websites and services.</p>	<ul style="list-style-type: none"> • Contact information and other identifiers • Device data • Internet and electronic network activity
<p>Engage in direct marketing and publicity. We market to consumers, professionals, and investors through a variety of channels, online and offline. For example, we may send promotional mail or email, call you to arrange a tour of our property, personalize our communications and your experience with us, or invite you to an event we host or sponsor. We also track the success and effectiveness of our marketing efforts. We may use automated processes to help tailor our interactions with you.</p>	<ul style="list-style-type: none"> • Contact information and other identifiers • Rental application and resident data • Demographic information • Commercial information • Professional and educational information • Your preferences, interests, and affiliations • Communications • Content • Internet and electronic network activity
<p>Engage in digital advertising. We use cookies, pixels, and other tracking technologies on our websites and social media pages to target digital advertising to you.</p>	<ul style="list-style-type: none"> • Contact information and other identifiers • Device data • Internet and electronic network activity
<p>Attract talent, process job applications, and evaluate job candidates. We use personal information to identify candidates, arrange interviews, and evaluate applicants' qualifications, for example.</p>	<ul style="list-style-type: none"> • Contact information and other identifiers • Demographic information • Professional and educational information • Your preferences, interests, and affiliations • Communications
<p>Operate and analyze our business. We may use personal information to conduct business analysis, perform business intelligence, and forecast demand, for example.</p>	<ul style="list-style-type: none"> • Contact information and other identifiers • Commercial information • Financial information • Your preferences, interests, and affiliations. • Communications • Content • Device data

	<ul style="list-style-type: none"> • Internet and electronic network activity.
<p>Aggregate or de-identify Personal Information. We aggregate or de-identify personal data for a variety of purposes, including tracking and monitoring trends over time.</p>	All categories of personal information, as needed.
<p>Detect and investigate fraud, security incidents, and violations of our policies and property agreements; protect our rights and property and enforce our policies and agreements. Online and offline, we use personal data to identify, investigate, and address a variety of issues, from resident disputes to property crimes. This may include using automated systems to detect security and safety issues, or to detect and prevent activities that violate our rights or our residents' rights.</p>	All categories of personal information, as needed
<p>Comply with laws and regulations or meet other requirements or obligations. For example, we may process your information to remember your contact preferences or cookie choices, meet our recordkeeping requirements, and fulfill our obligations.</p>	All categories of personal information, as needed.

In carrying out these purposes, we combine information we collect from different contexts and sources to provide you with more seamless and personalized experience, improve the effectiveness of our marketing efforts, make informed business decisions, and for other legitimate business purposes. For example, if you are a residential applicant, we may combine information from your online application with information we collect from you in person.

As described above, depending on our interactions, some of the information we collect may qualify as “sensitive” under certain privacy laws. We collect sensitive information to process residential applications, fulfill our obligations and meet legal requirements, and for other legitimate business purposes.

3. WHEN WE DISCLOSE PERSONAL INFORMATION

We disclose your personal information to others for legitimate business purposes and in a variety of circumstances. Please review the chart below to learn more about when we disclose your personal information to others.

Circumstance / Recipient	Examples	Categories of Personal Information Disclosed
With your consent, at your direction, or as required to fulfill your request.	<ul style="list-style-type: none"> If you submit a service request, we may need to share your information with a service provider to fulfill your request. If you submit a rental application, we may contact others to verify your information only as necessary to process your application. 	All categories of personal information, as required or necessary
Others / Public	<ul style="list-style-type: none"> If you engage with us on social media platforms, depending on your settings and the context, your personal information may be visible to others. If you write us a review or provide feedback, we may share that information with others as part of our marketing efforts. 	<ul style="list-style-type: none"> Non-sensitive contact information Content Communications Audio, video, images, and related data
Merger, Acquisition, or Sale	<ul style="list-style-type: none"> We might transfer or disclose your information to a third party, in the context of a sale or transfer of assets, or other disposition, of all or any part of our business. 	All categories of personal information, as required or necessary
Service Providers	<p>We hire other companies and individuals to perform business functions, which involve processing personal information on our behalf. For example, we hire:</p> <ul style="list-style-type: none"> Information technology vendors, who provide business productivity services, property management solutions, cloud hosting, digital fraud detection, chatbot platforms, and network security support. Marketing vendors to assist us in all aspects of our marketing efforts. Other professionals, such as consultants and accountants, who provide us with professional services, and Staffing agencies, who provide functions such as customer service or temporary workforce assistance. <p>Service providers only have access to the personal information needed to perform</p>	All categories of personal data

	their functions and agree to robust data protection requirements.	
Marketing and Advertising Providers	We hire other companies, including digital advertising platforms, for marketing and advertising purposes. These companies may use your personal information for their own purposes, in accordance with their privacy practices and terms. When we use Cookies and Similar Technology from these providers to collect personal information on our websites, that personal information is shared with such providers. Our use of this technology may be considered a 'sale' or 'sharing' of personal information.	<ul style="list-style-type: none"> • Non-sensitive contact information and other identifiers, including cookie IDs • Your preferences, interests, and affiliations. • Device data • Internet and electronic network activity
Housing Authorities	As required to meet our obligations, we may share financial statements, documents, and reports with housing authorities, including government lenders. Such materials, such as copies of rental agreements or rental reports, may include rental applicant and resident data.	<ul style="list-style-type: none"> • Contact information and other identifiers • Rental application and resident data
Law enforcement, government agencies, and other officials	We might disclose your information to any third party, without your consent and without notice to you, if we believe in good faith that we are legally obligated to do so. We may also disclose personal information if we believe the disclosure is: <ul style="list-style-type: none"> • required to obtain or facilitate emergency services. • necessary to protect, establish, or exercise our legal rights or defend against legal claims, or • necessary to protect our rights, property, and safety, and those of our residents, partners, investors, employees, and others. 	All categories of personal data, as required

4. COOKIES AND SIMILAR TECHNOLOGY

Cookies are small files placed on your device to store information, often consisting of a unique personal identifier. We use cookies and similar technology on our websites, apps, and promotional emails, like web beacons and pixels, to collect information about our digital interactions which we use for a variety of business purposes, including:

- ensuring our websites are functioning properly,
- keeping you signed in and remembering your cookie preferences,

- gathering insights about who visits our websites, such as the visitor's general geographic area, and how long they stayed,
- learning how you engage with our emails or the content on our websites,
- detecting fraud or violations of our Terms of Use,
- measuring the effectiveness of our marketing campaigns or the audience (page views) of our content, and
- providing you with a personalized, more seamless experience.

We permit third parties, including social media platform operators and analytics providers, to use cookies and similar technology on our websites to gather information for advertising, analytics, and marketing purposes.

In some cases, the third parties may use the information they collect for their own purposes in accordance with their own respective privacy policies and terms.

Our use of this technology, which allows third parties to collect personal information on our websites, may be considered a 'sale' or 'sharing' of personal information under privacy laws in certain instances. You can opt out as described in the section below, including by using the cookie banner on our website.

The third parties processing personal information on our websites are identified in our cookie banner and include Google. We use Google services, including Google Analytics, Google Ads, and Google Maps, on our websites that use cookies to transmit personal information to Google such as identifiers, device data, internet and electronic network activity data, and your IP address. See Google's [Privacy Statement](#) to learn more about how Google processes personal information. To opt out of Google Analytics, go to tools.google.com/dlpage/gaoptout. To adjust your Google advertising settings, visit adssettings.google.com.

You may be able to use global ad choice tools to control how certain third parties use the information that they collect about you on our websites and apps, as well as third-party services. To learn more, check out:

- The Digital Advertising Alliance (DAA) at aboutads.info/choices. For more about targeted advertising, and how to opt out with your specific browser and device, go to the [DAA Webchoices Browser Check](#); and
- The Network Advertising Initiative (NAI) at <https://optout.networkadvertising.org>.

Our websites honor the Global Privacy Control which you can learn more about at <https://globalprivacycontrol.org/>.

5. YOUR PRIVACY RIGHTS

Data privacy laws provide individuals with specific rights regarding their personal information. Depending on where you live, you may have all or some of the following rights and choices regarding your information.

- **The right to opt out.** You may have the right to limit our use of your personal information or to opt out of certain processing of personal information. To the extent the use of third-party cookies and similar technology on our websites, as described above, is deemed a 'sale' or 'sharing' under data privacy laws, or enables certain personalized advertising, you can opt out as described below, including by using our cookie banner.

- **The right to be informed or to know.** You may have the right to be informed of how we process your information. For example, you may have the right to be informed or to know:
 - The categories of personal information we collect and process about you.
 - The categories of sources of the personal information we collect and process about you.
 - The purposes for collecting or processing that personal information.
 - The categories of personal information shared or disclosed to third parties, the categories or names of those third parties, as well as the purposes of such sharing or disclosure.
- **The right to access.** You may have the right to access, view, and in some cases obtain a copy of the personal information we process about you.
- **The right to correct and delete.** You may have the right to request that we correct any of your personal information or delete it. If we receive a verifiable request to delete, we will delete (and notify any relevant third parties to delete) your personal information, unless an exception applies.
- **The right to not be subject to certain automated processing.** SRM does not engage in ‘profiling’ or automated decision making which has legal or significant effects.
- **Right to not be discriminated against for exercising your rights.** If you exercise your rights, we will not discriminate against you.

You can exercise your rights, as well as make choices about our collection and processing of your information. For example:

- **Cookie Banner.** You can indicate your cookie preferences using the cookie banner on our websites.
- **Unsubscribe.** Our marketing communications contain information about opting out of future marketing communications. You may opt out of receiving marketing emails from us by clicking on the ‘unsubscribe’ link contained in such emails. Please keep in mind that if you opt out of receiving marketing emails, we may still send you transactional communications, such as maintenance notifications.
- **Stop Texts.** You may opt out of receiving texts from us by texting the word STOP in response to a text message or following other instructions provided to you when you elected to receive texts. You may also opt out by contacting us here. If you opt out, we reserve the right to contact you for non-marketing purposes.
- **Resident Accounts.** Residents can use their online accounts to update their information or share updates with property managers.
- **Global Privacy Control.** Our websites honor the Global Privacy Control signal. You can learn more about the signal and how to enable it here: <https://globalprivacycontrol.org/>.
- **Other Privacy Controls.** You can also use global ad choice tools, as described above, provided by the DAA or NAI.

- **Contact us.** You can exercise these rights by submitting a request by (a) email to privacy@srmdevelopment.com, or (b) writing to us at: **SRM Development, LLC, ATTN: Legal, 111 N Post, Suite 200, Spokane, WA 99201.**

In your request, please specify the rights that you wish to exercise and include your email address. We complete privacy requests on the information linked to your email address and verify your identity by emailing the email address you provide and waiting for your response. In some instances, we may also ask for additional information to verify your identity. If you engage with us without creating an account and signing in, we may be unable to verify your identity or your personal information.

Depending on where you live, you may be able to designate an authorized agent to make a privacy request on your behalf. The agent must submit sufficient materials to validate it is authorized to act on your behalf, and we may contact you to verify your identity and the agent's authority prior to processing the request.

We will confirm receipt of a privacy request promptly. If we need more information to verify your identity or the authorized representative's authority to act on your behalf, we will let you know. Please allow us 45 days to respond to your request. If we cannot honor your request for any reason within that 45-day period, we will notify you.

Please note that with regard to all these rights, we reserve the right to: (a) verify your identity in order to process the request, or request further information for this purpose; (b) refuse your request based on the exemptions set out in any applicable data protection laws; and (c) charge you a reasonable administrative fee for any repetitive, manifestly unfounded, or excessive requests. If we deny your request to access your rights, you may appeal by contacting us. Depending on where you live, you may have the right to contact your state attorney general to report a privacy concern.

6. INFORMATION SECURITY, STORAGE, AND RETENTION

We use appropriate and reasonable physical, electronic, and administrative measures to protect your personal information against loss and unauthorized access, alteration, and use. Unfortunately, no measures offer absolute protection. As a result, we cannot guarantee the security of your information.

SRM processes and stores personal information in the United States. We consider the following factors when determining how long we keep and store your information:

- Our legal obligations,
- The purpose for which we collect or process your information,
- Your requests to delete the information,
- Retention periods in applicable laws and regulation, and
- Our legitimate business purposes. For example, we may retain your data to the extent it is necessary to prevent fraudulent activity, to protect ourselves against liability, and to allow us to enforce our rights and protect our property.

7. OTHER WEBSITES AND DIGITAL CONTENT

This Statement applies only to the personal information SRM processes. Our websites and our emails could have links to others' websites and services that are not owned or controlled by us. For example, our websites might enable social media platform sharing features, which let you share data with third parties,

your friends, or the public. We are not responsible for and have not reviewed the privacy practices of these other websites and services, though we encourage you to do so.

8. CHILDREN'S DATA

We may collect information about children from rental applications and residents to process applicants and meet our ongoing property management obligations.

We do not knowingly collect information from children under 16 online, nor do we sell or share such information. If you're a parent or guardian and become aware that your child has provided personal information to us online, please contact us and we will delete such information.

9. MODIFICATIONS TO THIS PRIVACY STATEMENT

We may need to update or revise this Statement from time to time to enhance transparency, as well as in response to changing legal, technical, or business developments. We will post any new or revised Statement here, and you should review this Statement regularly to make sure that you are aware of our processing of personal information and your rights. You can figure out if we revised this Statement since your last visit to our websites by referring to the last updated date at the top of this Statement. If there are material changes to the Statement, or if we intend to use earlier-collected personal information in accordance with the terms of the revised Statement and doing so would result in processing of personal information that is not consistent with the purpose for which the information was originally collected, we will notify you by prominently posting a notice of such changes before they take effect or by directly notifying you, and if required, we may request your consent.

10. CONTACT US

To ask us a question about this privacy notice or our practices, please (a) send an email to privacy@srmdevelopment.com or (b) write to the following address:

**SRM Development
111 N Post, Suite 200
Spokane, WA 99201**