



## CA South Management Privacy Policy

### CA South Privacy Policy

Updated June 4, 2020

CA South Management ("CA South", "we" or "us") provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use, storage, recordation, transmission, distribution, disclosure, and any other processing (collectively "processing") of personal information (as defined in applicable state statutes on security breach notification) that we receive from you and other users of our services, products, applications, content, features, and other offerings, including those available through [www.casouthmanagement.com](http://www.casouthmanagement.com) and our applications for mobile devices (collectively, the "Services"). This Privacy Policy may be updated from time to time to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your CA South account) or by means of a notice on the Services prior to the change becoming effective. We encourage you to periodically review this page at this URL for the latest information on our privacy practices. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms of Service.

Your privacy is important to us. CA South encourages you to read this Privacy Policy in its entirety, but here are a few key points of our privacy practices:

#### HOW CA SOUTH COLLECTS AND USES INFORMATION

When you use the Services, CA South collects certain personal information about you, including via cookies and similar technologies that collect information about your activities on the Services. CA South will process this information to provide you the Services, to communicate directly with you (including advertising), to conduct research, and for other purposes to which you consent.

#### HOW CA SOUTH MAY SHARE YOUR INFORMATION

CA South may share information about you with its affiliates, users of the Services, and business associates and service providers that perform services on CA South's behalf in connection with the Services.

#### YOUR RIGHTS OVER YOUR INFORMATION

You may access, modify and get copies of your personal information by contacting [admin@casouthmanagement.com](mailto:admin@casouthmanagement.com).

#### HOW CA SOUTH STORES AND PROTECTS YOUR INFORMATION

CA South will retain your information as long as necessary for the purposes outlined in this Privacy Policy. CA

South takes technological and operational measures to protect the information you provide through the Services against loss, theft and unauthorized access, use, disclosure or modification.

## **ADDITIONAL PRIVACY INFORMATION**

You may have additional privacy rights under applicable law. CA South is not responsible for the privacy practices of third parties. The Services are not for use by children under the age of 13 years old. CA South may update this policy from time to time, and you may contact CA South via the information below.

## **HOW CA SOUTH COLLECTS AND USES INFORMATION**

### **Information Collection**

We collect your personal information through the following methods:

#### **The Services**

When you register with us through the Services to make a booking or when you wish to contact another user, we will ask you for personal information that can be used to contact or identify you. Personal information includes, but is not limited to, your name, phone number, email address, social security number (SSN), home postal address and other location data, credit card number, and billing information. We also collect the other information that you provide as part of registration and the administration and personalization of your CA South account profile (e.g., without limitation, zip code (on its own) and individual preferences or demographic information). Some personal information is required, like your name and email address, and other personal information is optional, like your date of birth. We reserve the right to require address confirmation for rentals included in our Services. We collect personal information in connection with your registration to join the Services. You can register to join via the Services by completing the required forms.

#### **Third Party Services**

We also obtain data from third parties, including data brokers who provide supplemental data like demographics, and third party service providers, such as Facebook, if you register with CA South by logging into online accounts you may have with such providers (each such account, a "Third Party Account"). For example, as part of the functionality of the Service, you may link your CA South Account with Third Party Accounts, by either: (i) providing your Third Party Account login information to CA South through the Services; or (ii) allowing CA South to access your Third Party Account, as is permitted under the applicable terms and conditions that govern your use of each Third Party Account. Depending on the Third Party Accounts you choose and subject to the privacy settings that you have set in such Third Party Accounts, you understand that by granting us access to the Third Party Accounts, we will access, make available and store (if applicable and as permitted by the third party and authorized by you) the information in your Third Party Accounts so that it is available on and through your CA South Account on the Services. If there is information about your "friends" or people with whom you are associated in your Third Party Account, the information we obtain about those "friends" or people with whom you are associated, may also depend on the privacy settings you and such people have with the applicable third party. You should always review and, if necessary, adjust your privacy settings on third-party services before linking or connecting them to the Services.

#### **Log Data**

When you visit the Services, whether as a registered or a non-registered user just browsing, our servers automatically record information that your browser sends whenever you visit a website ("Log Data"). This Log

Data may include information such as your computer's Internet Protocol ("IP") address, browser type or the webpage you were visiting before you came to our Services, pages of our Services that you visit, the time spent on those pages, information you search for on our Services, access times and dates, browser type, referring/exit pages and URLs, number of clicks and how you interact with links within the Services, and other statistics. We use this information to monitor and analyze use and technical administration of the Services, to increase our Services functionality and user-friendliness, and to better tailor our Services to our users' needs. We also use this information to verify that users of the Services meet the criteria required to process their requests. We do not associate Log Data with other personal information, though we may aggregate, analyze and evaluate such information.

### **Cookies**

Like many websites, we use "cookies" to collect information. A cookie is a small data file that we transfer to your computer's hard disk for record-keeping purposes. We use cookies for two purposes. First, we utilize persistent cookies to save your login information for future logins to the Services. Second, we utilize session ID cookies to enable certain features of the Services, to better understand how you interact with the Services and to monitor aggregate usage by CA South Users and web traffic routing on the Services. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Services and then close your browser. Third party advertisers on the Services may also place or read cookies on your browser. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions and functionality of the Services.

### **Web Beacons**

Our Services may contain electronic images known as Web beacons (sometimes called pixel tags or clear gifs) and are used along with cookies to compile aggregated statistics to analyze how our Services are used and may be used in some of our emails to let us know which emails and links have been opened by recipients. This allows us to gauge the effectiveness of our customer communications and marketing campaigns. In most cases, you can disable the ability of Web beacons to capture information by blocking cookies.

### **Device Identifiers**

When you access or use the Services via a mobile device, CA South may access, collect, monitor and remotely store one or more "device identifiers," such as a universally unique identifier (UUID) on your device. Device identifiers are small data files or similar data structures stored on or associated with your device that uniquely identify your device. A device identifier may consist of data stored in connection with the device hardware, operating system or other software, or data sent to the device by CA South. A device identifier may convey information to CA South about how you browse and use the Services. A device identifier may remain persistently on your device to enhance your navigation within the Services. Some features of the Services may not function properly if use or availability of device identifiers is impaired or disabled.

### **Advertising Identifiers**

Advertising identifiers are unique strings associated with your mobile device that are provided by the operating system. Advertising identifiers may be modified or disabled by users in the device operating system's settings.

### **Location Data**

When you access or use the Services, CA South may access, collect, monitor and remotely store "location data," which may include GPS coordinates (such as latitude and/or longitude) or similar information regarding the location of your device. Location data may convey information to CA South about how you browse and use the

Services, where you travel, and the duration of your travel. Some features of the Services, particularly location-based services, may not function properly if use or availability of location data is impaired or disabled.

#### Email, Phone, SMS or Chat Via a CA South Account

As part of the Services, CA South users may communicate with us via email, phone, SMS or chat via the "Inquire" feature on the sites in which we advertise our listings (e.g., VRBO). Where users have selected the option of adding one or more email addresses to an online form, the message they create in the corresponding template will be sent to CA South from those email addresses via the advertising sites. These email addresses will be used by CA South only for the purpose of sending the communication to the addressee. Via the "Inquire" feature of the advertising sites, you may also speak with CA South representatives over the phone or initiate SMS or chat. These phone numbers will only be used by CA South to fulfill the Services.

#### Signals from Devices on the Rented Property

CA South may also collect information when you provide data through tablets, video doorbells, digital locks, and audio monitoring systems located in the rented properties. We may capture data such as maintenance and other guest requests, sound levels inside the property (but not any voices, conversations or communications). And, outside the property, audio, video, and other information about who and when people approach, enter, and leave the rented property. Such information will be used to respond to guest requests, monitor disturbances at the property and in the community, and keep owners and guests safe.

#### Phishing

Identity theft and the practice currently known as "phishing" are of great concern to CA South. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, your CA South Account ID, login password, or national identification numbers in a non-secure or unsolicited e-mail or telephone communication. Further, CA South will not, and the owners of listed properties are not permitted to, request money orders, cashier's checks, online bank transfers or cash outside of the CA South Services. Please be aware and report any suspicious activity to CA South. For more information about phishing, visit the Federal Trade Commission's website at <https://www.ftc.gov>.

#### Information Use

In addition to the uses described above, we use your personal information to provide and improve our Services, facilitate the listing and booking of rental properties and completing your transactions, administer your use of the Services and address your inquiries, conduct statistical or other analysis, and to enable users to enjoy and easily navigate the Services. We also use your personal information to contact you with CA South newsletters, marketing or promotional materials, information related to your use of the Services, and other information that may be of interest to you. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any of the communications or update your "Notifications" information within the Services (see "Your Rights Over Your Information" below).

#### Analytics information

CA South may collect, measure and analyze traffic and usage trends for the Services, and may use third-party analytics tools, including Google Analytics and other cloud-based tools, for such purposes ("Analytics Tools"). This allows CA South to understand, among other things, who is using the Services, how they are using it, and ways to improve the Services. Analytics Tools may use cookies and persistent device identifiers to collect and store information about you, such as time of visit, pages visited, time spent on each page, IP address, location, and type of operating system used. You can learn more about Google Analytics and your options for opting out of interest-based Google ads at <https://adssettings.google.com>.

## **Commercial Communications**

CA South may use the information CA South collects or receives to communicate directly with you, such as sending you SMS and emails containing newsletters, promotions and special offers. CA South may also use the information to send you service-related notices (such as account verification, services reminders and status updates, and technical and security notices).

## **HOW CA SOUTH MAY SHARE YOUR INFORMATION**

CA South may share information about you with its affiliates, users of the Services, and business associates and service providers that perform services on CA South's behalf in connection with the Services.

### **Listings**

The listing and booking of rental properties, as well as the guest ratings and reviews, are visible to all users of the Services. If you post your rental property, you authorize CA South to publish and list that property, and related information, publicly via the Services and enable third parties to publish your property on their websites. We may also display the geographical location of your property in the form of a map and street address.

If you request to make a booking via the Services, CA South may share the following information about you with the applicable property owner: (i) your first and last name, email and phone number, (ii) the names of any members of a third party service with whom you are connected or associated on such service; and (iii) in certain cases your billing information.

We also may share your personal information with third parties for industry analysis, demographic profiling and other purposes, provided that such information has been de-identified or aggregated with the information from other customers or users in a manner that does not allow such information to be separated from the aggregate information and identified as originating from you.

### **Service Providers**

We may employ third party companies and individuals to facilitate our Services, to provide the Services on our behalf, to perform other related services (e.g., without limitation, maintenance services, database management, web analytics, fraud detection services relating to the activity of CA South Users and improvement of the Services features) or to assist us in analyzing how our Services and Applications are used. These third parties may have access to your personal information; if they do, this access is only so that they may perform these tasks on our behalf and they are obligated not to disclose or use it for any other purpose. We may also provide personal information to our business partners or other trusted entities for the purpose of providing you with information on goods or services we believe will be of interest to you. You can, at any time, opt out of receiving such communications.

### **Compliance with Laws and Law Enforcement**

CA South cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of CA South or a third party, to protect the vital interests or safety of the public or any person, to prevent or stop activity we may consider to be, or to pose a risk of being, illegal or unethical, or pursue legally permissible actions.

## **International Transfer**

**YOUR INFORMATION MAY BE TRANSFERRED TO AND MAINTAINED ON COMPUTERS, SYSTEMS, AND NETWORKS LOCATED OUTSIDE OF YOUR STATE, PROVINCE, COUNTRY OR OTHER GOVERNMENTAL JURISDICTION WHERE THE PRIVACY LAWS MAY NOT BE AS PROTECTIVE AS THOSE IN YOUR JURISDICTION. IF YOU ARE LOCATED OUTSIDE THE UNITED STATES AND CHOOSE TO PROVIDE INFORMATION TO US, CA SOUTH TRANSFERS PERSONAL INFORMATION TO THE UNITED STATES AND PROCESSES IT THERE. YOUR SUBMISSION OF INFORMATION TO CA SOUTH AS SET FORTH IN THIS PRIVACY POLICY REPRESENTS YOUR CONSENT TO THAT TRANSFER.**

## **Business Transfers**

**CA South may sell, transfer or otherwise share some or all of its assets, including your personal information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.**

## **YOUR RIGHTS OVER YOUR INFORMATION**

**All Members may review, update, correct or delete the personal information in their registration profile by contacting us at [admin@casouthmanagement.com](mailto:admin@casouthmanagement.com) or editing the relevant part of their profile. If you would like us to cancel your CA South Account, please contact us. Please note that, if you cancel your CA South Account, any reviews you have posted via the Services will remain publicly viewable via the Services. Please see below for privacy contact information.**

## **Accessing and Managing Your Personal Information**

**To the extent provided by the law of your jurisdiction, you may (i) have the right to access certain personal information we maintain about you and request details about how we process it, (ii) request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes, (iii) request that we update or correct inaccuracies in such information, (iv) object to our use of your personal information, (v) ask us to block or delete your personal information from our database, and (vi) request to download the personal information you have shared on the Service. You may make these requests and any other inquiries about this Privacy Policy by emailing us at [casouthmanagement.com](mailto:casouthmanagement.com). Any such requests are subject to the protection of other customers' rights and applicable law. Additionally, to help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.**

## **Controlling Your Settings**

**You can manage settings through the settings menu on the Services. You can limit your browser or mobile device from providing certain information by adjusting the settings in the browser, operating system or device. Please consult the documentation for the applicable browser, operating system or device for the controls available to you. You can also stop receiving promotional emails from CA South by following the unsubscribe instructions in those emails. Note that unsubscribe is not available for certain emails, such as those concerning your relationship or dealings with CA South and those necessary to provide the Services.**

**Please also note when you post a message in a CA South blog, forum, chat room, review, or customer feedback, the information you post may be accessible to other users of the Services and the public. If you post personal information anywhere on the Services that is accessible to other users or the public, you are advised that such personal information can be read, collected, used, or disseminated by others and could be used to send you unsolicited information or otherwise. Accordingly, you assume full responsibility for posting such data and**

agree that CA South is not responsible in any way for such publicly posted personal information.

### Targeted Advertising

You can learn more about targeted ads and your choices to prevent third parties from delivering targeted ads to your browser or device by visiting <https://optout.networkadvertising.org/> and <http://optout.aboutads.info/>. You should be aware that even if you opt out of targeted ads, you may still see ads within the Services, although the ads may not be tailored to your interests.

### Do Not Track

At this time, CA South does not recognize “do not track” signals sent from web browsers. Third-party services that CA South uses may collect personal information about individual users and their activities over time and across different websites. In some cases, you may be able to disable tracking mechanisms, but doing so may disable certain features of the Services. To disable tracking, please consult the documentation for your browser, operating system or device. For some devices, it may not be possible to disable tracking mechanisms. Please review the section of this Privacy Policy regarding our use of cookies and similar technologies for more detail.

## HOW CA SOUTH STORES AND PROTECTS YOUR INFORMATION

CA South will retain your data as long as necessary for the purposes outlined in this Privacy Policy and for a commercially reasonable time thereafter for backup, archival, fraud prevention, or detection or audit purposes, or as otherwise required by law.

CA South takes technological and organizational measures to protect the information you provide through the Services against loss, theft, and unauthorized access, use, disclosure or modification. CA South encrypts your information on CA South systems and complies with applicable data protection laws, including applicable data breach notification laws, to protect your information.

When you enter sensitive information (such as credit card number and/or social security number) on our registration or order forms, we encrypt that information using secure socket layer technology (SSL). We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Services, you can contact us. However, CA South cannot ensure or warrant the security of any information you transmit to CA South or guarantee that information within the Services will not be accessed, disclosed, altered or destroyed. Communications sent to or from the Services may not be secure. You should use caution whenever submitting information online and take special care in deciding what information you send to CA South via email.

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored personal information (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting on the Services in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

## ADDITIONAL PRIVACY INFORMATION

## Links to Other Websites

Our Services contain links to other websites. If you choose to visit an advertiser by "clicking on" a banner ad or other type of advertisement, or click on another third party link, you will be directed to that third party's website. The fact that we link to a website or present a banner ad or other type of advertisement is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data, and solicit personal information from you. Other websites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

Some portions of the Services implement Google Maps/Earth mapping services, including Google Maps API(s). Your use of Google Maps/Earth is subject to Google's terms of use, located at, [https://www.google.com/intl/en\\_us/help/terms\\_maps.html](https://www.google.com/intl/en_us/help/terms_maps.html), which incorporates Google's Privacy Policy, located at, <https://www.google.com/policies/privacy/>.

## Testimonials

With your consent we may post your testimonials, feedback, and other comments regarding the Services along with your name. If you want your testimonial removed please contact us at [admin@casouthmanagement.com](mailto:admin@casouthmanagement.com).

## Our Policy Toward Children

The Services are not directed to individuals under 18. We do not knowingly collect personal information from children under 13. If you are under the age of 13, you may not use the Services or submit any personal information through the Services. If a parent or guardian becomes aware that his or her child has provided us with personal information without their consent, he or she should contact us. If we become aware that a child under 13 has provided us with personal information, we will delete such information from our files.

## Contacting Us

If you have any questions about this Privacy Policy or for a copy of this Privacy Policy in pdf format, please contact us [admin@casouthmanagement.com](mailto:admin@casouthmanagement.com).