

Privacy Policy: Applicant and Resident Personal Information

Last Updated Date: May 4, 2026

I. Introduction

This Privacy Policy (“Privacy Policy”) describes the types of Personal Information that National Community Renaissance of California (“Company,” “we,” or “us”) collects from and about residential applicants and residents of our communities, how we use it, with whom we share it, and your rights regarding your Personal Information.

This Privacy Policy covers Personal Information we collect when you:

- apply for an apartment, including through affordable housing programs;
- reside in our apartment communities;
- participate in optional components of our Energy and Utilities Monitoring Program; and/or
- participate in other services or events we offer to members of our communities.

Access to this Privacy Policy is also available to you through the Property Manager’s office in each of our respective communities.

What is “Personal Information”?

“Personal Information” is any information that identifies, relates to, describes, or could reasonably be linked to you, either directly or indirectly. “You” means an applicant to or resident of one of our residential communities.

For example, Personal Information can include:

- Contact Information – such as your name, phone number, email, or mailing address.
- Application Information – such as your income, employment details, or rental history.
- Sensitive Information – such as your Social Security or driver’s license number.
- Financial Information – such as bank account or payment information.

For a summary of the Personal Information we collect from or about you, please see Section II (*Personal Information We Collect and From Where We Collect It*) below.

What is Not Covered by this Privacy Policy?

We also collect information that is not legally considered Personal Information because, for example, it cannot identify you or has been stripped of details that would allow someone to link the information to you.

Examples of information that is not Personal Information include:

- Aggregated Information – such as average energy use across a building without identifying any individual unit or resident.

- De-identified Data – information that has been processed so it can no longer be linked to you or your household.
- Publicly Available Information – information lawfully available from government records or information that we have a reasonable basis to believe is lawfully made available to the general public by you, such as information posted by you to our social media page.
- Building Operational or System Data – information about how building systems operate when the information does not relate to or is unable to identify a specific person or unit, such as building-wide utility performance metrics.

We may collect, process, and disclose aggregated or de-identified information for any purpose, without restriction, consistent with applicable law. When we collect, process, or disclose aggregated or de-identified information, we will maintain and use it in de-identified form and will not attempt to reidentify the information, except to determine whether our de-identification processes satisfy any applicable legal requirements.

This Privacy Policy also does not cover Personal Information we collect through our website. For information about Personal Information we collect through the nationalcore.org website, please see our website privacy policy, available at <https://nationalcore.org/privacy-policy/>.

How This Privacy Policy is Organized

Because we collect different kinds of Personal Information depending on how you interact with us, specifically (1) through a residential application, including affordable housing applications; (2) as resident in one of our communities; (3) through the Energy and Utilities Monitoring Program and (4) other services or events we offer to members of our communities, this Privacy Policy explains how Personal Information is collected, used, and shared by us for each purpose.

II. Personal Information We Collect and From Where We Collect It

The chart below identifies the categories of Personal Information we collect from our residential applicants or residents, including within the last 12 months, and from where we collect that information.

Category	Examples	How it is Collected
Identifiers.	A real name, alias, postal address, unique personal identifier, email address, energy and utilities monitoring device serial numbers affiliated with your unit, account name, Social Security number (SSN), driver’s license number, passport number, or other similar identifiers.	Identifiers are collected in leasing applications, affordable housing applications, from residents, through the Energy and Utilities Monitoring Program, and other services or events we offer to community residents.
Other Personal Information categories (Cal.	A name, signature, Social Security number (SSN), photograph (such as part of a copy of a driver’s license or state	This Personal Information is collected in leasing applications, affordable

<p>Civ. Code § 1798.80(e).</p> <p>Note: Some Personal Information included in this category may overlap with other categories.</p>	<p>identification card), address, telephone number, passport number, driver’s license or state identification card number, property insurance policy number, employment, employment history, bank account number, credit card number, debit card number, or any other financial information for rent payments, medical information, or health insurance information (to the extent necessary for purposes of a requesting a reasonable accommodation).</p>	<p>housing applications, and from residents.</p>
<p>Protected classification characteristics under California or federal law (“Protected Classes”).</p>	<p>Age (40 years or older), race, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), military and veteran status, or genetic information (including familial genetic information).</p>	<p>This Personal Information is collected in affordable housing applications.</p>
<p>Geolocation data.</p>	<p>Physical location or movements.</p>	<p>While we do not track the physical location or movements of applicants or residents, including through the Energy and Utilities Monitoring Program and any technology-supported entry/exit devices (such as key fobs or security cameras in common areas), it is possible that we could assess when you are/were home and when you are/were not home or when you accessed an amenity based on energy and utilities usage data or technology-supported entry/exit devices.</p>
<p>Professional or employment-related information.</p>	<p>Current or past job history.</p>	<p>This Personal Information is collected in leasing applications and affordable housing applications.</p>

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Sensitive Personal Information.	Social Security number (SSN), driver’s license number, state identification card number, racial or ethnic origin, citizenship or immigration status, health-related information (to the extent necessary for purposes of requesting a reasonable accommodation), Personal Information about residents or potential residents under age 16.	Sensitive Personal Information is collected in leasing applications and affordable housing applications.

You may always choose what information you share with us. Please note that if you choose not to share information that is mandatory to receive the related services, we may not be able to provide you with those services. If you have any questions about what Personal Information is mandatory to receive our services, please contact us as provided in Section VIII (*Contact Us*) below.

Sensitive Personal Information

“Sensitive Personal Information” is a subtype of Personal Information we may collect consisting of the specific information listed above. Please note that we do not collect or use Sensitive Personal Information to infer characteristics about you.

III. Sources of Personal Information

We obtain the categories of Personal Information listed above from several sources, depending on how you interact with us and the programs in which you participate. These sources include:

- Directly from you – This includes information you provide on residential and affordable housing applications, or via in-person meetings, phone calls, or any other interactions with community staff during the housing application process, affordable housing program application process, or as resident in one of our communities, including through community services and events offered to our residents.
- Indirectly from you – This includes, for example, information you share when submitting maintenance requests or rent payments, use of the optional resident app, use of access control technology (e.g., key fobs, garage door openers) participate in resident events, or when you contact us with questions, complete surveys, or engage with our resident energy efficiency coordinator.
- From our service providers – These are companies that help us carry out our work, such as:
 - application processing or screening providers,
 - income-verification services,
 - payment processors, providers of our optional resident app, providers of our access control technology
 - energy and utility-monitoring service providers, and

- other companies that perform services on our behalf and provide us with Personal Information, such as organizations that provide services to or host events for members of our communities.
- From government agencies or program administrators – This may include information needed to process affordable housing applications or verify eligibility for housing programs.
- From building or community systems – This may include, for example, information collected through:
 - security cameras in common areas,
 - building access systems (such as key fob or entry logs),
 - resident package registration and collection systems,
 - energy and utility-monitoring systems (which only provide information about your utilities and energy usage and do not control or change your energy or utility services in any way), or
 - other safety and security devices, such as water leak detection systems and other similar technologies designed to detect unusual usage or potential malfunction.
- From your household members or authorized representatives – This includes information shared by anyone applying for an apartment with you or acting on your behalf.

IV. How We Use Personal Information

We may use the Personal Information we collect in connection with your leasing application, affordable housing application, residency in our community, to provide you with services we offer or events available to residents in our communities, or participation in our Energy and Utilities Monitoring Program. Different types of Personal Information are used for different purposes, so not all your Personal Information is used for every purpose described in this Privacy Policy. This section explains the main purposes for which we use Personal Information.

Affordable Housing Program: Application, Eligibility, and Compliance

The Company owns and operates rental communities that participate in various federal, state, and local affordable housing programs. These programs may limit occupancy to households meeting specific income and other requirements based on household size. Rent is often based on income levels or other program rules. To administer these programs, we must collect and verify certain information about prospective and current residents to:

- process and review affordable housing program applications;
- verify eligibility requirements to live in a regulated affordable housing unit, such as income, assets, employment history and status, student status, household size, credit history, and other eligibility criteria;
- confirm continued eligibility at application, move in, annual certification or recertification, and when a household's income or other qualifying circumstances change;
- comply with the rules and legal requirements governing each program.

Residential Purposes

If you are a resident in one of our communities, we may use Personal Information to:

Operate and Maintain Safe, Functional Communities

- manage maintenance requests and unit repairs and provide notices regarding the same;
- operate building systems and secure access to community areas;
- ensure community safety, including the use of cameras in common areas where applicable;
- identify and respond to building or property concerns;
- process payments or recover delinquent payments;
- communicate important notices to you.

Support Community Management and Internal Operations

- maintain our records and internal systems;
- conduct data analysis, troubleshooting, quality control, and service improvement;
- manage resident communications and support needs;
- protect the Company, our staff, and our communities from fraud, misuse, or harm, including to defend our legal rights.

Hope through Housing and other Resident Services and Events

We may use Personal Information to offer or connect residents to services through Hope through Housing (<https://hthf.org/>) or other resident services and events. For example, service providers may come to our communities to offer and provide services to families, children, and senior residents in our communities. Please note that we do not directly engage with the service providers or request your Personal Information from them. We may, however, know that our residents are receiving services from the providers. We do not maintain or do anything with such information.

Energy and Utilities Monitoring Program

We may use Personal Information to support our Energy and Utilities Monitoring Program.

There is no cost to residents to participate in or benefit from the Energy and Utilities Monitoring Program. Further, the devices connect to internet services that are provided and paid for by us, not by residents.

The purpose of the Energy and Utilities Monitoring Program is to:

- develop and provide educational resources to residents about energy-efficient living that will help residents conserve energy and potentially save on their utility bills;
- help our communities and buildings conserve energy and potentially save on our utility bills;
- help reduce the risk of harm related to electrical, water, or other utilities-related issues; and
- support independent research and inform the development of energy-efficient affordable housing in California.

Please note that we may make limited inferences at the unit level solely to understand energy or utility usage patterns and to support building and resident safety, maintenance, educational resources, and energy-efficiency planning. We do not create personal profiles about individual residents based on this information or your Personal Information.

Devices and Technologies Used

To support these goals, we may use energy and utility monitoring technologies, including:

- electricity and utilities-usage monitoring devices;
- programmable thermostats;
- water-leak detection devices;
- water-usage meters; and
- other similar technologies designed to detect unusual usage or potential malfunction.

These devices may be installed in common areas and individual residential units, including your unit. The devices are designed to collect information about energy or utility usage and system performance and to share that information with us and our properties for the purposes described in this Privacy Policy. We may also rely on vendors of these devices to collect relevant information and link that information to your specific unit, which will help us achieve the purposes described in this Privacy Policy. Please see Section V (*Disclosure of Personal Information*) for additional information about sharing Personal Information with others.

Opt-Out

You may opt-out of the Energy and Utilities Monitoring Program solely for purposes of collecting information about your energy and utilities usage to support resident education and independent research. You may not opt-out of the use of devices that are in place to protect resident and building safety, such as water-leak detection devices, water-usage meters, and other technologies used to detect unusual utilities usage or potential malfunction.

How We Use Energy and Utilities Usage Information

We may use information collected through the Energy and Utilities Monitoring Program to:

- identify which unit is associated with a particular monitoring device;
- assess energy and utility consumption at the unit or building level;
- detect unusual patterns that may indicate equipment malfunction, water leaks, electrical issues, or other conditions that could create safety risks or risks to the building, including excessive costs;
- develop and provide educational materials to residents to help them understand energy use and reduce energy consumption;
- promote conservation of natural resources; and
- support research and planning related to energy-efficient and sustainable affordable housing in California.

When analyzing usage data, we may also consider general unit characteristics—such as unit size, number of bedrooms or bathrooms, or building orientation—to better understand factors that may influence energy use.

Resident Protections and Program Limitations

The information collected through this program:

- is not used to control your utilities or change your level of service;
- is not shared with the utility companies that provide electricity, gas, or water to our properties;
- is not used to take negative or adverse action against you, including enforcement actions related to your tenancy.

As noted, certain monitoring devices may be installed for building safety and property protection purposes (such as water-leak detection, safety monitoring, and malfunction detection) and are not optional. These required safety systems are designed to detect equipment conditions or system issues and are not intended to collect, analyze, or use information to evaluate individual resident behavior or personal characteristics. Any information generated by these systems is used solely for maintenance, safety, and property protection purposes.

Other General Uses of Personal Information

Meet our Legal and Contractual Obligations

- comply with applicable federal, state, and local housing laws and program requirements;
- meet obligations under your lease or other agreements with you;
- respond to audits, inspections, and reporting obligations for affordable housing programs, including those of lenders and investors; respond to lawful requests, court orders, or regulatory requirements.

Enforce Corporate Governance and Legal Rights

- complete a sale, merger, or acquisition where some or all the Personal Information we maintain is included as part of such transaction, including due diligence related to such transaction, if applicable;
- exercise or defend legal rights of the Company, its employees, or residents.

Sensitive Personal Information Use and Disclosure Purposes

We may use or disclose Sensitive Personal Information for the following reasons:

- Performing actions that are necessary to provide you with our services and maintain our relationship with you.
- Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information.
- Defending against and prosecuting those responsible for malicious, deceptive, fraudulent, or illegal actions directed at the Company.
- Ensuring physical safety.

- Short-term, transient use, such as non-personalized advertising shown as part of your current interactions with us, where we do not:
 - disclose the sensitive Personal Information to another third party; or
 - use it to build a profile about you or otherwise alter your experience outside your current interaction with the Company.
- Services performed for the Company, including maintaining or servicing accounts, processing or fulfilling transactions, verifying your information, processing payments, or providing financing, analytic services, storage, or similar services for the Company.

We do not use or disclose Sensitive Personal Information for purposes other than the purposes described in this section.

Additional Categories of Personal Information or Use for Other Purposes

We will not collect additional categories of Personal Information or use the Personal Information we collect for materially different, unrelated, or incompatible purposes without providing you with notice. If required by law, we will also seek your consent before using your Personal Information for a new or unrelated purpose.

V. Disclosure of Personal Information

Disclosure of Affordable Housing-Related Information

When required by applicable program rules and contractual agreements, we may disclose affordable housing-related information, including income, household composition, and other required information to:

- affordable housing regulators,
- lenders or investors associated with the property, and
- partners involved in the oversight or financing of the community.

We may also disclose household income and composition information when needed to obtain or maintain property tax exemptions available only for eligible affordable housing units.

We only disclose the Personal Information required by a regulator, lender, investor, or program partner.

No Sale or Commercial Sharing of Affordable Housing-Related Personal Information

The Company does not “sell” or “share,” as defined by applicable law, Personal Information from affordable housing applications.

Disclosures Related to Our Communities Generally

We may disclose Personal Information to:

- Service providers and contractors that support day-to-day community operations, such as property management, payment processing, debt collection, maintenance, building systems, safety, compliance, and resident services functions.

Disclosures Related to the Energy and Utilities Monitoring Program

We may disclose Personal Information to:

- Energy and utilities monitoring device manufacturers and service providers to install, operate, maintain, and support monitoring devices and to assess energy or utility usage at the unit or building level.
- Independent researchers and academic institutions, such as universities, to support research related to energy efficiency, resident education, and the development of sustainable and affordable housing.
- Government agencies, including the California Energy Commission (CEC), in connection with grant-funded programs. Information shared with these entities is limited to what is required and may include de-identified or aggregated findings or summary results.
- The Company’s property management and operations teams to ensure building and equipment protection, safety, and maintenance and community management.

Selling or Sharing Personal Information

We do not sell your Personal Information, including sensitive Personal Information, to third parties and have not sold it in the preceding 12 months. We do not share your Personal Information with third parties for cross-context behavioral advertising purposes and have not shared your Personal Information in the preceding 12 months.

VI. Your Rights and Choices

Energy and Utilities Monitoring Program

You must not tamper with or remove any energy or utilities monitoring device installed in your unit.

Right Not to Participate in Certain Components

You may choose not to participate in the optional energy-usage monitoring portion of the Energy and Utilities Monitoring Program, including monitoring for purposes of developing and sharing resident energy education materials, to support research to develop resident education and inform affordable housing, and to understand your specific energy uses.

If you do not wish to participate in the described energy-usage monitoring, you may notify your Property Manager in writing or send a written request by email to EnergyQuestions@nationalcore.org.

After we receive your request, we will stop collecting electricity-usage data from that device.

No Penalty for Non-Participation in Optional Components

Choosing not to participate in the optional electricity-usage monitoring portion of the program:

- does not affect your tenancy;
- does not result in penalties, fees, or adverse action; and
- does not change your utility service or rates.

Required Participation

Your right not to participate does not apply to certain energy and utilities monitoring technologies that are installed for community safety, building protection, and system integrity. These required systems may include, for example:

- water-leak detection devices;
- malfunction or fault-detection systems for plumbing, electrical, or building equipment; and
- similar technologies designed to reduce the risk of fire, flooding, property damage, or unsafe living conditions.

Participation in these activities is required and is not optional.

These required safety systems are designed to detect equipment conditions or system issues and are not intended to collect or analyze Personal Information about residents. Any information generated by these systems is used solely to support maintenance, safety, and property protection.

Additional Rights

Right to Know and Data Portability Requests

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information (the “**right to know**”), including the specific pieces of Personal Information we have collected about you (a “**data portability request**”). You may exercise your right to know twice in any 12-month period (see *How to Exercise Your Rights* below).

Right to Delete and Right to Correct

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions and limitations (the “**right to delete**”). Once we receive your request and confirm your identity, we will delete your Personal Information from our systems unless an exception allows us to retain it. We will also notify our service providers, contractors, and other recipients to take appropriate action.

You also have the right to request correction of Personal Information we maintain about you that you believe is inaccurate (the “**right to correct**”). We may require you to provide documentation, if needed, to confirm your identity and support your claim that the information is inaccurate. Unless an exception applies, we will correct Personal Information that our review determines is inaccurate and notify our service providers, contractors, and other recipients to take appropriate action.

Right to Non-Discrimination

You have the right to be free from discrimination or retaliation for exercising any of the rights above.

Please note that we do not provide the right to opt-out of sale/sharing of Personal Information, because we do not use applicant or resident Personal Information to engage in such conduct. Additionally, we do not provide the right to limit use of Sensitive Personal Information, because we do not collect or use applicant or resident Sensitive Personal Information in a way that requires us to limit such use.

How to Exercise Your Rights

Exercising the Rights to Know, Delete, Correct, or Access

To exercise the rights described above, please submit a verifiable request to us by either:

- Calling us at 888-499-3858
- Emailing us at DataPrivacy@nationalcore.org

Please describe your request in sufficient detail so we can properly understand, evaluate, and respond to it. You or your authorized agent may only submit a request to know, including for data portability, twice in a 12-month period.

Verification Process and Authorized Agents

Only you, or someone legally authorized to act on your behalf, may make a request to know, delete, correct, or access related to your Personal Information. You may also make a verifiable request on behalf of your minor child. We may request specific information from you or your authorized representative to confirm your or their identity before we can process your request Personal Information.

We cannot respond to your request if we cannot verify your identity or authority to make the request and confirm the Personal Information relating to you. We will only use Personal Information provided in the request to verify the requestor's identity or authority to make the request.

Responding to Your Requests to Know, Delete, Correct, or Access

We will confirm receipt of your request within ten business days. If you do not receive confirmation within the ten-day timeframe, please contact us via one of the contact methods described in *Exercising the Rights to Know, Delete, Correct, or Access* above.

We endeavor to substantively respond to a verifiable request within 45 days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing. We will deliver our written response to your verified email address, mailing address, or other contact information you designated when making your request. Our substantive response will tell you whether we have complied with your request. If we cannot comply with your request in whole or in part, we will explain the reason, subject to any legal or regulatory restrictions. Applicable law may allow or require us to refuse to provide you with access to some or all the Personal Information that we hold about you, or we may have destroyed, deleted, or made your Personal Information anonymous.

Any disclosures we provide will cover information for the 12-month period preceding the request's receipt date. We will consider requests to provide longer disclosure periods that do not extend past January 1, 2022, unless providing the longer timeframe would be impossible or involves disproportionate effort.

For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

VII. Privacy Policy Changes

We reserve the right to update this Privacy Policy at any time. If we make any material changes to this Privacy Policy, we will provide you with advance notice as required by applicable law, update the Privacy Policy's Last Updated Date, and post the updated Policy to our website at

nationalcore.org/resident-privacy. Access to this Privacy Policy is also available to you through the Property Manager's office in each of our respective communities.

VIII. Contact Us

General Inquiries

If you have any questions about this Privacy Policy, or to exercise your data subject rights please contact us at:

Phone: 909-483-2444

Toll free: 888-499-3858

Email: DataPrivacy@nationalcore.org

Postal Address:

National Community Renaissance of California

Attn: Legal Department

9692 Haven Avenue, Suite 100

Rancho Cucamonga, CA 91730

Energy and Utilities Monitoring Program - ONLY

If you have questions about or wish to opt-out of the optional components of our Energy and Utilities Monitoring Program, please use the following contact information:

Email: EnergyQuestions@nationalcore.org

Phone: Please refer to the phone number for general contact with your apartment community or, if different, the direct phone number provided by your community to contact your Property Manager.

Toll free: 888-499-3858

Postal Address:

National Community Renaissance of California

Attn: COREvolution

9692 Haven Avenue, Suite 100

Rancho Cucamonga, CA 91730

You may also notify your Property Manager in writing of your request to opt-out.

IX. Accessibility

If you need to access to this Privacy Policy in an alternative format due to having a disability, please contact Bill Miller by email at bmiller@nationalcore.org or by phone at 909-294-6153.