

Privacy Policy

Effective Date May 1, 2024

This Privacy Policy describes how Northland Investment Corporation (“Northland”, “we”, “our”, or “us”) collects, uses, shares and protects personal information when you interact with Northland, including our properties, websites, mobile apps, and emails (collectively our “Services”). This Privacy Policy explains:

- [Personal Information We Collect](#)
- [Cookies and Information Collected By Automated Means](#)
- [How We Use Your Information](#)
- [How We Share Your Information](#)
- [How We Protect and Store Your Information](#)
- [Retention of Your Information](#)
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- [Additional Notice: Your Rights Under Certain U.S. States](#)

Please note that this Privacy Policy does not apply to non-Northland websites or services that state that they are offered under a different privacy policy. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

For questions about our privacy practices, please email us at customerservice@northland.com or write to us at:

Northland Investment Corporation
2150 Washington Street
Newton, MA 02462

1. Personal Information We Collect

Depending on the nature of your interaction with Northland, we may collect personal information as follows:

- Directly from you, when you provide information to us or interact with us:
 - *Account information*, including your name, email address, selected password, and usage preferences, which may include signing up for communications from us.
 - *Contact information*, including your telephone number, email address, mailing address, and any other information you choose to include when you communicate with us via email, mail, phone or other channels.
 - *Payment information*, including payment information and transaction history if you engage in a transaction through the Services.
 - *Personal details*, including your name, date of birth, Social Security number, driver’s license number, and accommodation requests.
 - *Professional information*, such as your employment history and income.
 - *Visual information*, including CCTV footage of you at Northland properties.

- Automatically from you, *device information and online user activity* when you utilize our online Services, as described in the next section.
- From third parties:
 - *Information about your credit history and your identity* from agencies and other entities that provide credit scoring, identity verification, and similar services.
 - *Information about the marketing and advertisements you have seen or clicked on* from online advertising companies.
 - *Information about your rental* from property management companies who manage Northland properties on our behalf, such as your name and address.

Some of this information may be collected by external parties on our behalf. For example, we use a payment processor when you engage in a transaction with us; Northland does not itself collect or store payment card information.

If you provide us with personal information regarding another individual, you represent that you have that person's consent to give us his or her information and to permit us to use the information in accordance with this Privacy Policy.

2. Cookies and Information Collected by Automated Means

When you interact with our online Services, certain information about your use of our online Services is automatically collected, including:

- *Usage details* about your interaction with our online Services, such as the date, time, and length of visits, specific pages or content accessed during the visits, search terms, frequency of the visits, and referring website address.
- *Device information* about the device you use to access our online Services, such as IP address, device type, unique device identifier, operating system, browser type, and mobile network information.
- *Location information* where you choose to provide our online Services with access to information about your device's location.

Much of this information is collected through cookies and other tracking technologies, which may be operated by our partners who assist us in collecting information about usage of the online Services, serving ads, or security and fraud prevention.

For example, we use Google Analytics to collect usage details. You can learn more about Google Analytics by visiting <https://support.google.com/analytics/answer/6004245>, and opt out of collection of your data by using the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout>. We also use Google Ads to customize our advertising and to serve you ads based on your browsing behavior. You can learn more about Google Ads at <https://policies.google.com/privacy>, and can opt out of personalized advertising through Google's Ad Settings at <https://adssettings.google.com/>. We may also use cookies set by other third-party partners.

You may be able to control how information is collected by cookies as described in [Your Privacy Options](#).

3. How We Use Your Information

We use the personal information we collect from you for the following purposes:

- Provide our Services to you, including to create and maintain your account, manage transactions, evaluate rental applications, perform credit checks, and provide maintenance services.
- Respond to your requests and questions, communicate with you, provide support, and provide other important notices and updates.
- Manage, maintain, and operate the online Services, diagnose or fix technology problems, and monitor the performance of the online Services.
- Improve the Services and grow our business, understand our consumer base and effectiveness of our marketing, design and administer marketing campaigns, and tailor the content we display to you on the online Services.
- Comply with legal requirements and industry standards, comply with law enforcement or other legal requests, defend against legal claims or other demands, protect the rights of Northland, you, or others, detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, and engage in risk management activities.

We may use and share information in an aggregated or de-identified manner data at our discretion, including for research, analysis, modeling, marketing, and improvement of our Services.

4. How We Share Your Information

We may share the information we collect in the following instances:

- *With service providers* that we believe need the information to perform a technology, business, or other professional function for us such as billing and collection, IT services, maintenance and hosting of our online Services, payment processors, accounting, auditing, and tax services, and other professional services.
- *With providers of on-site tenant services*, such as trash or internet, as necessary to facilitate your lease.
- *With analytics partners* who collect information via tracking technologies on our online Services to assist us with measuring visits and traffic on our websites so we can measure and improve the performance of the online Services.
- *With advertising partners* who assist us in serving advertising regarding the Services to others who may be interested in the Services. These third parties may use tracking technologies to collect or receive information from the online Services and elsewhere on the internet and use that information to provide measurement services and target ads. Third parties may allow other companies to access information about you so that they may market other products you may be interested in.
- *With entities in our corporate family*, for purposes consistent with this Privacy Policy, to carry out our Services and to the extent permitted by law.
- *When a corporate event occurs*, we reserve the right to transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Policy.
- *For legal purposes*, where necessary to comply with the law, in response to court orders, law enforcement or legal process, including for national security purposes, to establish, protect, or exercise our legal rights, as

required to enforce our terms of use or other contracts, to defend against legal claims or demands, or to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.

5. How We Protect and Store Your Information

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf. If you use our Services outside of the United States, you understand that we may collect, process, and store your personal information in the United States and other countries.

6. Retention of Your Information

We will retain your personal information for as long as is necessary to complete the purposes for which it was collected, or as may be required by law.

We utilize the following criteria to determine the length of time for which we retain information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or as otherwise necessary to investigate theft or other activities potentially in violation of our policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety;
- The privacy impact of ongoing retention on you; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

7. Your Privacy Options

You may have certain choices when it comes to how we collect and use your personal information:

- *Account information:* Please visit your Northland account to view and update certain personal information associated with your account, such as your contact information.
- *Cookie preferences:* You have several options to either prevent our collection of information regarding your online activity, or prevent third parties from using such information from being used for interest-based advertisements:
 - Your browser or device may include “Do Not Track” functionality; please note that we do not respond to such signals. However, our online Services are designed to honor Global Privacy Control signals.

- You can modify your browser setting to disable or reject cookies across the internet; but if you do so, some features of our online Services may not function properly or be available. If you are visiting the online Services from a mobile device, the operating system of the device may offer you options regarding how the device collects and uses your information for interest-based advertising. Please visit <https://thenai.org/opt-out/mobile-opt-out/> for more information.
- You may be able to prevent third parties from using your information for interest-based advertisements across the internet by visiting <http://www.networkadvertising.org> or <http://www.aboutads.info>. Please note this does not opt you out of being served ads, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs.
- *Email marketing:* If at any time you no longer wish to receive marketing communications from us, you can click the unsubscribe link at the bottom of any email.

8. Updates to This Privacy Policy

We may make changes to this Privacy Policy from time to time. The “Effective Date” at the top of this page indicates when this Privacy Policy was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Privacy Policy.

9. Additional Notice: California Residents

California Notice at Collection

Collection, Use, and Retention

You have the right to receive notice of the categories of information we collect and the purposes for which those categories of will be used, as well as certain rights to your personal information. For information about your rights, please see [Additional Notice: Your Rights Under Certain U.S. States](#).

The following chart describes our practices with regard to the collection, use, and retention of your information if you a California consumer, including a business contact, investor, tenant, or website visitor. The categories we use to describe the information are those listed in California law. Certain information may fall into multiple categories, and in some circumstances, how we use and how long we keep the information within each category will vary. The examples listed below are illustrative and do not represent a complete description of the information we process.

Category	Required Information
Personal Identifiers	<p><u>Examples of what we collect:</u> Name, email address, physical address, unique identifiers (such as those assigned in cookies).</p> <p><u>Sources:</u> Directly from you; from our third-party property management company.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain identifiers are maintained throughout our relationship with you in order to provide the Services. When we no longer provide Services to you, we may still need this information for a period of time for business and legal requirements.</p>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<p><u>Examples of what we collect:</u> Telephone number, Social Security number, bank account number.</p> <p><u>Sources:</u> Directly from you; from our third-party property management company.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain identifiers are maintained throughout our relationship with you in order to provide the Services. When we no longer provide</p>

	Services to you, we may still need this information for a period of time for business and legal requirements.
Commercial information	<p><u>Examples of what we collect:</u> Transaction information, payment records.</p> <p><u>Sources:</u> Directly from you; from our third-party property management company.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> The law requires us to maintain these records for a period of time, which varies by state.</p>
Employment-related information	<p><u>Examples of what we collect:</u> Employer name, business contact information.</p> <p><u>Sources:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain identifiers are maintained throughout our relationship with you in order to provide the Services and manage our relationship with you. When our relationship ends, we may still need this information for a period of time for business and legal requirements.</p>
Internet or other similar network activity	<p><u>Examples of what we collect:</u> Unique numerical identifier, cookie or tracking pixel information, device ID, browsing history, search history, IP address, interaction with a website, interaction with advertisement.</p> <p><u>Sources:</u> Automatically from you; third parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Internet or other similar network activity is typically deleted at regular intervals when the information is no longer necessary for the purpose for which it was collected.</p>
Audio, electronic, visual, thermal, olfactory, or similar information	<p><u>Examples of what we collect:</u> CCTV footage.</p> <p><u>Sources:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> CCTV footage is deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected.</p>
Sensitive information	<p><u>Examples of what we collect:</u> Social Security number, password or credentials allowing access to an account.</p> <p><u>Sources:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain identifiers are maintained throughout our relationship with you in order to provide the Services. When we no longer provide Services to you, we may still need this information for a period of time for business and legal requirements.</p>

We do not collect the following categories from our California consumers: protected classifications, biometric information, geolocation data, education information, or inferences.

Sale, Sharing, and Other Disclosure of Personal Information

Any category of information listed in the chart above may be disclosed for a business purpose to service providers and contractors, which are companies or individuals that we engage to conduct activities on our behalf. Service providers and contractors are restricted from using personal information for any purpose not related to our engagement.

California law also requires us to provide you with information regarding the parties to whom we sell (disclosing personal information for monetary or other benefit) or share (disclosing personal information for purposes of cross-context behavioral advertising) your information. We sell or share your information as follows:

- *Identifiers:* Analytics partners and advertising partners.

- *Personal information categories listed in the California Customer Records statute:* Analytics partners and advertising partners.
- *Internet or other similar network activity:* Analytics partners and advertising partners.

We do not knowingly sell or share the personal information of minors. We may disclose your information in other ways that are not considered sales under the law. Please see [How We Share Your Information](#) above for more information about how we share your information.

10. **Additional Notice: Nevada Residents**

Residents of the Nevada have the right to opt out of the sale of certain pieces of their information to third parties. Please see “*cookie preferences*” under [Your Privacy Options](#) to opt out.

If we collect consumer health data of Nevada residents, we comply with Nevada law regarding notice and will provide additional disclosures as appropriate.

11. **Additional Notice: Rights Under U.S. Privacy Laws**

The laws of certain U.S. states provide their residents with certain rights to their personal information. We will not discriminate against you for exercising these rights. If you are a resident of one of the following states, this section summarizes your rights: **California** and **Texas**.

You have the right to **access**, **delete**, and **correct** certain personal information we collect about you. You may submit a request to exercise these rights by emailing us at customerservice@northland.com, or by calling us at 617.965.7100. You may authorize another individual or a business, called an authorized agent, to make requests on your behalf through these means. In order to process your request, we must verify your request. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email account stated in the request. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Please see [Your Privacy Options](#) to **opt out of personalized advertising** and the **sale** of personal information via cookies.

While you have the right to **limit use of your sensitive personal information**, we only process your sensitive personal information for purposes allowed by law and therefore do not offer an option to limit further processing.

While Texas residents have the right to **opt-out of automated decision making**, we do not use personal information to make automated decisions about you in any situations where you may have a legal right to opt out.

Texas residents have the right to **appeal** our decision if we deny your request. You can request further review by emailing us at customerservice@northland.com.