

## Privacy Policy

Effective Date: August 22, 2023

This Privacy Policy (“**Privacy Policy**”) explains how Boca Grove Property Owners Association, including its affiliates, subsidiaries, and holding companies and any subsidiaries of those holding companies (collectively “**Boca Grove**,” “**we**,” “**our**,” or “**us**”) processes and collects information, including personal information, relating to our visitors, users, customers, dealers, any successors and assigns, and any people using the Boca Grove Property Owner’s Association Mobile Application or website (collectively, the “**Sites**”) under your account (collectively, “**you**”). You are responsible for making sure all users under your account understand and agree to this Privacy Policy.

By downloading, accessing, and/or using the Sites, you accept and agree to be bound by all terms of this Privacy Policy. If you do not agree with any portion of it, then you must not download, access, or use the Sites. We may change this Privacy Policy from time to time, so check this policy regularly for updates. If you do not agree to the terms and conditions of this Privacy Policy, then please do not provide us with your information. Please note, however, that if you choose to limit the information that you provide to us while using the Sites, you may not be able to use or participate in certain features of the Sites.

**By downloading, accessing, using, or attempting to interact with any part of the Sites, or otherwise providing us with information, you are consenting to the practices described in this Privacy Policy.**

### Changes and Updates to This Privacy Policy

We reserve the right to revise or update this Privacy Policy at any time, and you should periodically read the Privacy Policy to learn of any revisions or updates. We will notify you of any changes to the Privacy Policy by posting the revised or updated Privacy Policy and its “Effective Date” on the Sites. Using the Sites thereafter constitutes your agreement to and acceptance of the Privacy Policy and its revisions or updates; provided, however that we will provide notice of any material changes via the contact information for you which we have on file.

### 1. Collection of Personal Information

“**Personal Information**” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, as defined by applicable privacy laws.

We collect Personal Information about you in various ways, including:

- directly from you
- automatically when you download or use the Sites

#### 1.1. Information We Collect Directly from You

You may provide Personal Information to us directly in numerous ways. For example, when you register to become a member or utilize the Sites to complete reservations. We collect the following types of Personal Information from you directly:

- **Identifiers**, including real name, postal address, email address, telephone number.
- **Other Information**, including any additional information you may voluntarily provide to us.

#### 1.2. Information We Automatically Collect About You

Boca Grove may automatically collect Personal Information about you when you use the Sites. This information is primarily needed to maintain the security and operation of the Sites, and for our internal analytics so that we can improve our Sites. This information includes:

- **Internet or Other Electronic Network Activity Information**, including browsing history, browser and device information, hardware model, software, preferred language, unique device identifiers, network information, clickstreams, search history, information regarding your interaction with our Sites, IP address, cookies, pixel tags, browser version, and operating system.

Google Analytics. Visitors to the Sites may be tracked using Google Analytics. The Personal Information collected by Google Analytics is primarily used to optimize the Sites for users and for internal analytics purposes. The Personal Information we automatically collect using Google Analytics is shared with Google. For more information on Google's Privacy Policies, visit: <https://policies.google.com/privacy>. You can also opt-out of having your personal information used by Google Analytics by following the instructions located at <https://tools.google.com/dlpage/gaoptout/>. Google Analytics may collect the following types of data from users of the Sites:

- Type of web browser used, software manufacture and version number.
- Type of operating system
- Color processing ability of the users screen
- JavaScript support
- Flash version
- Screen resolution
- Network location and IP address
- Country, city, state, region, county, or any other geographic data
- Hostname
- Bandwidth (internet connection speed)
- Time of visit
- Pages visited
- Time spent on each page of the Sites
- Referring site statistics
- The website the user came through in order to arrive at the Sites
- Search engine query used

## 2. **How We Use Personal Information**

- **Provide the Services.** We may use your Personal Information to provide the services, or any other content you may request from us. For example, to create your account, to bill you for your use of membership services, and to send you updates and alerts regarding your account.
- **Monitor the Services.** We collect your Personal Information for monitoring purposes to help us diagnose problems with our servers, administer and troubleshoot the Sites, calculate usage levels, analyze industry standards, and analyze transactions, trends, and statistics regarding the use of the Sites.
- **Respond to Inquiries and Fulfill Requests.** We may use your Personal Information to respond to your inquiries and to fulfill your requests for information.
- **Improve the Services.** We may use your Personal Information to make the Sites more stable and user-friendly, to analyze service issues, improve the design and content of the Sites, personalize your experience, and analyze how the Sites are used. We may also send you feedback surveys and forms.
- **Customer Service.** We may use your Personal Information when contacting you regarding customer service or in response when you provide feedback via a survey or other form. We may also use your information to

send administrative emails regarding the Sites or to inform you of any changes to this Privacy Policy, our terms, or other legal terms.

- **Support Business Operations.** We may use your Personal Information to support our internal and business operations.
- **Enforce Agreements.** We may use your Personal Information to enforce separate agreements between you and us, enforce this Privacy Policy, our terms, or other legal terms.
- **Fulfill Other Purposes.** We may use your Personal Information to fulfill: (a) any other purpose for which you provide it; (b) any legal or regulatory requirements and any of our internal policies; (c) other purposes disclosed at the time of collection; (d) any other purpose with your consent; and (e) any other purposes set forth in this Privacy Policy.

### 3. Disclosure of Personal Information

Except as otherwise prohibited by law or regulation, and subject to applicable instructions from you to us, we may share or allow access to your Personal Information with your consent or for a variety of business and commercial purposes, including, for example:

- **Sharing Across Affiliates.** With our parent, subsidiary, and affiliate companies for business, operational, and legal purposes.
- **Provide, Improve, and Maintain Our Services.** With service providers or contractors that provide business, professional, or technical support functions for us and help us provide, improve, and maintain the Sites, such as by administering activities on our behalf, including third-party payment processing, network operations, hosting, information technology, billing and payment processing, customer service, analysis, and other operations related to the Sites.
- **Protect Our Services and Users.** With governmental authorities or other entities if we believe disclosure is necessary or appropriate to protect against fraudulent, malicious, abusive, unauthorized, or unlawful use of our Services; protect our network, databases, Sites users, and employees from physical or financial harm; and investigate violations of our contractual obligations.
- **Legal Rights and Obligations.** With governmental authorities, auditors and third-party identity verification services, credit bureaus or collection agencies, and other entities to the extent necessary to respond to subpoenas, court orders, search warrants, or other legal process; respond to requests for cooperation from law enforcement or other government entities; comply with legal and regulatory obligations, including identity verification, fraud and identify theft protection, and protection, advancement, or defense of our rights or the rights of others; recover payment for previously-billed services; and facilitate or verify the appropriate calculation of taxes, fees, or other obligations due to local, state, or federal governments and governmental agencies.
- **Sale or Transfer of Business or Assets.** With our professional advisers in connection with a corporate transaction, such as a sale, assignment, divestiture, merger, bankruptcy, consolidation, reorganization, liquidation, or other transfer of the business or its assets. If another entity acquires us or any of our assets, your Personal Information may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such sale or transfer occur, we will use reasonable efforts to try to require that the buyer or transferee use your Personal Information in a manner that is consistent with this Privacy Policy.
- **Emergencies.** With governmental authorities or other entities or individuals in emergency situations involving danger of death or serious physical injury to you or any other person, to respond to 911 requests, and for other emergencies or exigencies.

- **Authorized Representatives.** If another individual is managing your account with us or your email account which the Services connect to on your behalf (for example, a child managing the account of a parent), as authorized by you or as a personal representative under applicable law, that person can view all Personal Information about you.

We do not and will not sell or knowingly allow third parties unauthorized access to your Personal Information.

### **Third Party Links**

The Sites may link to third-party websites, online services, mobile applications and/or contain advertisements from third parties that are not affiliated with us—and which may link to other websites, services, or applications. Please be aware that we are not responsible for the privacy or practices of other websites or third parties. We do not make any guarantee regarding those third-party websites, services, or applications, and we are not liable for any loss or damage caused by the use of such sites. Any data collected by third parties is not covered by this Privacy Policy. You should review the policies of the third parties and contact them directly if you have any questions about their services or practices.

### **Mobile Applications**

When downloading an app or using an app with on-line features, the app provider will typically also collect certain device and app-related information. We do not control the requirements or policies of app stores. Please review the privacy policy and terms of use of the mobile app stores before downloading or using any app and check your device settings for control options.

### **Public Activities**

We may offer publicly available spaces on the Sites where you and other users may communicate, interact, and engage with each other as well as add information about yourself and your content, such as the links to our social media pages (“**Public Activities**”). If you choose to engage in Public Activities on the Sites, please be aware that any information you share may be read, collected, or used by other users, third parties, and the public, including those that do not adhere to our Privacy Policy. You should use caution in disclosing Personal Information on your profile or on any other publicly available space on the Sites. We are not responsible for events arising from the distribution of any information you choose to publicly post or share.

### **Correcting and Updating Your Personal Information**

You may correct and update your information by contacting us as directed in the “[Contact Us](#)” section below. We will use reasonable commercial efforts to make changes you request, but it is not always possible or commercially reasonable to modify database or backup information. We may retain certain information unaltered for legal or other appropriate reasons. To the extent that personal information was provided to third parties, we will not be able to make changes to it. Information may not be completely removed from our database(s) due to technical constraints and the fact that we back-up our systems.

### **Information Retention**

We retain the information we collect for as long as you maintain a membership or as is reasonably necessary to fulfill the purposes for which we collect the information, and for any legitimate and essential business purpose, such as maintaining the performance of the Sites, making data-driven business decisions about new features and offerings, complying with legal obligations, resolving disputes and to serve our reasonable interests (e.g., until termination of any statutes of limitation). If you are no longer a member, we will retain your information in accordance with our data retention policies.

### **Confidentiality and Security**

Boca Grove values your privacy and is committed to protecting your information. We have appropriate administrative, technical, and physical safeguards in place to ensure the integrity and security of your information. We undertake commercially reasonable efforts to guard against unauthorized access, use, alteration, or destruction of Personal Information.

### **Children**

Boca Grove does not knowingly collect or solicit Personal Information on individuals under the age of 16. If we learn that we have inadvertently collected or received Personal Information from a person under the age of 16, other than where such Personal Information has been provided by an adult (such as a parent or guardian), we will delete that information as quickly as possible. If you believe that we, with the exception of where such personal information has been provided by an adult (such as a parent or guardian) may have any Personal Information from or about a person under the age of 16, please contact us using the information listed in the "[Contact Us](#)" section below.

### **Visiting The Sites from Outside of the United States**

The Sites and data we receive from other sources are hosted in the United States and are governed by United States law. Your Personal Information may be transferred to, and maintained on, computers located outside of your state, province/territory, or country where the privacy laws may not be as protective as those where you live. If you are located outside the United States and choose to provide Personal Information to us, please be aware that we transfer your Personal Information to the United States and process and store it there. As a result, this Personal Information may be subject to access requests from governments, courts, law enforcement officials and national security authorities in the United States according to its laws. Subject to the applicable laws, we will use reasonable efforts to ensure that appropriate protections are in place to maintain protections on the Personal Information. By submitting your Personal Information, you consent to having your Personal Information transferred to, processed, and stored in the United States.

### **Contact Us**

If you have any queries concerning your personal information or any questions on our use of that information, please contact us as noted below or as otherwise advised on the Sites:

**Cathryn Vaughn (Director of Communications & Policy)**  
**Boca Grove Property Owners Association, Inc.**  
**21351 Whitaker Drive**  
**Boca Raton, Florida 33433**