

Privacy Policy

Last Updated: February 4, 2026

Emor Management, Inc. ("Company," "we," "us," or "our") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you interact with our services, including our website, resident portals, and SMS/MMS messaging program.

1. Information We Collect

1.1 Information You Provide Directly

- **Contact Information:** Name, email address, phone number, mailing address
- **Identification Information:** Government-issued ID numbers, Social Security Number (for application/screening purposes only)
- **Financial Information:** Bank account details, payment card information, income verification documents
- **Lease and Tenancy Information:** Rental history, current and prior addresses, employment information
- **Communications:** Messages, emails, and correspondence with our team
- **SMS/MMS Consent Records:** Phone numbers, opt-in timestamps, consent method, and communication preferences

1.2 Information Collected Automatically

- **Device Information:** IP address, browser type, operating system, device identifiers
- **Usage Data:** Pages viewed, links clicked, access times, referring URLs
- **Location Data:** General geographic location based on IP address
- **SMS/MMS Delivery Data:** Message delivery status, timestamps, carrier information

1.3 Information from Third Parties

- **Screening Services:** Credit reports, background check results, eviction history (with your authorization)
- **Previous Landlords:** Rental history verification
- **Service Providers:** Payment processors, maintenance vendors

2. How We Use Your Information

We use collected information for the following purposes:

- **Property Management Operations:** Processing applications, managing leases, collecting rent, coordinating maintenance

- **Communications:** Sending transactional messages, responding to inquiries, providing customer support
- **SMS/MMS Messaging:** Delivering maintenance updates, lease reminders, payment confirmations, and property announcements (with your consent)
- **Legal Compliance:** Meeting regulatory obligations, responding to legal requests, enforcing our agreements
- **Service Improvement:** Analyzing usage patterns, improving our services, troubleshooting issues
- **Security:** Detecting fraud, protecting against unauthorized access, maintaining system integrity

3. SMS/MMS Messaging Program Privacy

3.1 Data Collection for SMS/MMS

When you opt in to our SMS/MMS messaging program, we collect:

- Your mobile phone number
- Date, time, and method of consent
- Message history and delivery status
- Opt-out requests and timestamps

3.2 Use of SMS/MMS Data

Your phone number and SMS/MMS consent information are used solely for:

- Delivering messages you have consented to receive
- Maintaining opt-in/opt-out records for compliance purposes
- Responding to HELP requests
- Improving message deliverability

3.3 No Sharing for Marketing Purposes

We do not sell, rent, lease, or share your phone number, SMS/MMS consent, or messaging data with third parties for their marketing purposes. Your mobile information will not be shared with third parties or affiliates for promotional purposes.

3.4 Third-Party Service Providers

We may share your phone number with third-party service providers who assist in delivering our SMS/MMS messages (e.g., messaging platforms, telecommunications providers). These providers are contractually obligated to:

- Use your information only to provide services on our behalf
- Maintain appropriate security measures
- Not use your information for their own marketing purposes
- You may read more about Avery's privacy policy at <https://www.callavery.com/privacy>

4. Information Sharing and Disclosure

We may share your information in the following circumstances:

4.1 With Your Consent

When you have provided explicit consent for specific sharing purposes.

4.2 Service Providers

With vendors and service providers who perform services on our behalf, including:

- Payment processors
- Maintenance and repair contractors
- Background screening services
- SMS/MMS messaging platform providers
- Cloud hosting and data storage providers

4.3 Legal Requirements

When required by law, regulation, legal process, or governmental request, including:

- Court orders and subpoenas
- Law enforcement requests
- Regulatory compliance obligations

4.4 Business Transfers

In connection with a merger, acquisition, bankruptcy, or sale of assets, your information may be transferred as part of that transaction. You will be notified of any such change.

4.5 Protection of Rights

When necessary to protect our rights, property, or safety, or the rights, property, or safety of others.

5. Data Security

We implement reasonable administrative, technical, and physical security measures to protect your personal information, including:

- Encryption of sensitive data in transit and at rest
- Access controls limiting who can view personal information
- Regular security assessments and monitoring
- Employee training on data protection practices

However, no method of transmission over the Internet or electronic storage is 100% secure. We cannot guarantee absolute security.

6. Data Retention

We retain your personal information for as long as necessary to:

- Fulfill the purposes described in this Privacy Policy
- Comply with legal and regulatory obligations
- Resolve disputes and enforce agreements
- Maintain business records as required by law

SMS/MMS consent records are retained for a minimum of **four (4) years** from the date of consent or last interaction, in accordance with TCPA and carrier requirements.

7. Your Rights and Choices

7.1 Access and Correction

You may request access to your personal information and request corrections to inaccurate data by contacting us.

7.2 Deletion

California residents may request deletion of your personal information, subject to certain legal exceptions (e.g., records required for legal compliance or ongoing tenancy).

7.3 SMS/MMS Opt-Out

You may opt out of SMS/MMS messages at any time by replying **STOP** to any message or contacting us directly. See our SMS/MMS Terms and Conditions for complete opt-out instructions.

7.4 Marketing Communications

You may opt out of promotional emails by clicking the "unsubscribe" link in any marketing email or contacting us.

7.5 Do Not Track

Our website does not currently respond to "Do Not Track" signals.

8. California Privacy Rights (CCPA/CPRA)

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA):

- **Right to Know:** Request disclosure of personal information collected, used, and shared
- **Right to Delete:** Request deletion of your personal information
- **Right to Correct:** Request correction of inaccurate personal information

- **Right to Opt-Out of Sale/Sharing:** We do not sell or share personal information for cross-context behavioral advertising
- **Right to Non-Discrimination:** You will not be discriminated against for exercising your privacy rights

To exercise these rights, contact us using the information below.

9. Children's Privacy

Our services are not directed to individuals under 18 years of age. We do not knowingly collect personal information from children. If we become aware that a child has provided us with personal information, we will take steps to delete such information.

10. Third-Party Links

Our website or communications may contain links to third-party websites. We are not responsible for the privacy practices of these external sites. We encourage you to review the privacy policies of any third-party sites you visit.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The "Last Updated" date at the top indicates when the policy was last revised. Material changes will be communicated through our website, email, or other appropriate means. Your continued use of our services after changes constitutes acceptance of the updated policy.

12. Contact Us

If you have questions about this Privacy Policy or our data practices, please contact us:

Emor Management, Inc. 305A West 19th Street, New York, NY 10011 Phone: 212-727-8208
Email: info@emormanagement.com

For SMS/MMS support, reply **HELP** to any text message or contact us at the information above.

This Privacy Policy is effective as of 2/4/2026.