

Circle T Ranch Privacy Policy and Terms of Use

Last modified: September 22, 2021

Introduction

Hillwood Development Company, LLC, doing business as Circle T Ranch (“**Company**” “**Us**” “**Our**” or “**We**”), respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. This Privacy Policy describes:

- The types of information we may collect or that you may provide when you access or use the Company’s website located at www.circletranch.com (the “**Hillwood Site**”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies only to information we collect through the Hillwood Site and any electronic communications sent through the Hillwood Site.

This Privacy Policy DOES NOT apply to information that:

- We collect offline or on any other Company or affiliate apps or websites, including websites you may access through the Hillwood Site.
- You provide to or is collected by any third party.

Any other Company or affiliate websites and apps and the websites and apps of third parties have their own privacy policies, which we encourage you to read before providing information on or through them. Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not use the Hillwood Site. By using the Hillwood Site, you agree to this Privacy Policy and Terms of Use. This Privacy Policy and the Terms of Use may change from time to time (see “**Changes to Our Privacy Policy and Terms of Use**” section below). Your continued use of the Hillwood Site after we make changes is deemed to be acceptance of those changes, so please check periodically for updates. The “last modified” date above will be updated to reflect the most recent changes that have been made.

1. Information We Collect and How We Collect It

We collect information from and about users of the Hillwood Site:

- Directly from you when you provide it to us (**Information You Provide to Us**).
- Automatically when you use the Hillwood Site (**Automatic Information Collection and Tracking**).

A. Information You Provide to Us

All Users. When you use the Hillwood Site, you have the option of voluntarily contacting us through (i) the “Contact” page on the website; or (ii) through “Contact” links provided for our various divisions and projects. By contacting Hillwood, you are consenting to our replies to your communications.

Communicating with us through these customer service channels allows us to answer questions and provide you with assistance. We do not retain information you provide through the “Contact Us” page or links for general marketing purposes. By voluntarily contacting us, you may provide information by which you may be personally identified, such as name, email address, telephone number, or any other identifier by which you may be contacted online or offline (“**personal information**”). We may retain records and copies of your correspondence, if you contact us. If you do not want to provide us with personal information, you may simply choose not to contact us online.

Customers. We collect information from customers when they contact us through the means noted above. Customers of Hillwood have the ability to access additional functionality on the Hillwood Site.

B. Automatic Information Collection and Tracking

When you access and use the Hillwood Site, we use technology and analytic tools, such as Google Analytic, to automatically collect:

- **Usage Details.** When you access the Hillwood Site, we may automatically use analytic tools to collect overall information regarding usage of the Hillwood Site. The analytic tools provide us with information such as numbers of unique visitors, number of visits, number of page views, the frequency, dates, and times of visits, communication data, and the resources that users access and use on the Hillwood Site.
- **Device Information.** We may collect information about the type of computer or device you use to access the Hillwood Site and the internet connection you use, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- **Location Information.** The Hillwood Site does not collect real-time information about the location of your device.

To learn more about Google Analytics visit: <https://analytics.google.com>. If you do not want us to collect this information, you may opt out at any time by changing your cookies and tracking settings on your computer or device. Once provided, you may send us a request to delete your information as provided in the **Accessing and Correcting Your Personal Information** section below. Note, however, that in some instances, opting out of tracking features will affect the accessibility or functionality of certain aspects of the Hillwood Site.

The technologies we use for automatic information collection may include:

- **Session Cookies.** A session cookie is a small file placed on your smartphone or computer, which is used only during the time you are actively on the Hillwood Site. It may be possible to refuse to accept cookies by activating the appropriate setting on your smartphone or

computer. However, if you select this setting you may be unable to access certain parts of the Hillwood Site or certain functionality may be disabled.

- **Web Beacons.** Pages of the Hillwood Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related web/app statistics (for example, recording the popularity of certain content and verifying system and server integrity).

We do not perform behavioral tracking, such as using these technologies to collect information about your activities over time and across third-party websites, apps, or other online services.

2. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with access to the Hillwood Site and any other information, products, or services that you request from us.
- Fulfill any other purpose for which you provide it.

The usage information we collect helps us to improve the Hillwood Site and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize the Hillwood Site according to your individual interests.
- Speed up your searches.
- Recognize you when you use the Hillwood Site.

3. Disclosure of Your Information

We may disclose non-personally identifiable aggregated information about our users and other information that does not identify any individual or device without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our employees, contractors, service providers, and other third parties we use to support our business and website and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which it was disclosed to them.
- To our subsidiaries and affiliates or to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Company about the Hillwood Site users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.

- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from the Terms of Use or any contracts entered into between you and us.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our customers, tenants, employees, or others. This includes exchanging information with other companies and organizations for the purposes of public safety or fraud protection.

4. Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Newsletters from the Company (if applicable).** If you no longer wish to receive newsletters from us, you can opt-out by clicking the “unsubscribe” button at the bottom of the email forwarding the newsletter or by sending us an email with the subject line “Unsubscribe” stating your request to webmaster@hillwood.com.

5. Accessing and Correcting Your Personal Information

You can review and change your personal information that you provided to us through the Hillwood Site by contacting us at webmaster@hillwood.com. If you want us to delete all your information, you may also send us an email at webmaster@hillwood.com to request deletion of any personal information that you have provided to us. We may elect not to accommodate a request to delete information if we believe the change would violate any law, legal requirement, or tenant obligation. If we receive an email from you, we will delete your information within thirty (30) days unless we notify you otherwise. **California residents may have additional personal information rights and choices. California residents should see the Supplemental Privacy Notice for California Residents at the end of this Privacy Policy.**

6. Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on secure servers behind firewalls and is encrypted. The safety and security of your information also depends on you. We urge you to be careful about giving out information in public areas of the Hillwood Site, like message boards. The information you share in public areas may be viewed by any user of the Hillwood

Site. Unfortunately, the transmission of information via the internet and mobile platforms is never completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through the Hillwood Site. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

7. Terms of Use

All information appearing on the Hillwood Site is provided for your convenience only. Company does not represent or warrant that the information provided on the Hillwood Site is accurate or up-to-date.

All artwork, videos, images, content, text, and other materials appearing on the Hillwood Site are subject to copyrights owned by Company, its affiliates, or its licensors. Any reproduction, retransmission, or replication of all or part of any materials, content, image, video, or recording found on the Hillwood Site is expressly prohibited unless Company or the copyright owner of the material has expressly granted its prior written consent to reproduce, retransmit, or republish the material. All rights reserved.

The names, trademarks, service marks and logos of the Company appearing on the Hillwood Site may not be used in any advertising or publicity, or otherwise to indicate the Company's sponsorship of or affiliation with any product or service, without the Company's prior express written permission.

The Hillwood Site may contain links to social media sites that are not under the control of Company. These links are provided as a convenience to you and the Company is not responsible for the content, policies, or security protocols of any such sites. The inclusion of any such link within the Hillwood Site does not imply any approval or endorsement of such linked sites or their operators.

Any claim relating to the Privacy Policy and/or Terms of Use, or the operation or use of the Hillwood Site or the products and services thereon, shall be governed by the laws of the State of Texas without regard to its conflict of law provisions. Venue for any claim shall be brought in a state or federal court having jurisdiction located in Dallas County, Texas.

8. Changes to Our Privacy Policy and Terms of Use

We may update our Privacy Policy and Terms of Use from time to time. If we make material changes to how we treat our users' personal information, we will post the new policy/terms on this page with a notice that the policy/terms have been updated and, if we have your email because you have subscribed to receive emails from us, we will endeavor to notify you by email to the email address you provided. The date the Privacy Policy and Terms of Use were last revised is identified at the top of the page. You are responsible for periodically visiting this page to check for any updates.

9. Children Under the Age of 13

The Hillwood Site is not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at webmaster@hillwood.com.

10. Contact Information

To ask questions or comment about this Privacy Policy and Terms of Use, contact us at: webmaster@hillwood.com.

Supplemental Privacy Notice for California Residents

Effective Date: September 22, 2021

This Supplemental Privacy Notice for California Residents supplements the information contained in this Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

1. Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include: (i) publicly available information from government records; or (ii) de-identified or aggregated consumer information.

In particular, we may have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	NO

	Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the categories of personal information listed as collected above from the following categories of sources: (i) Directly from you (for example, from forms you complete or products and services you purchase); and (ii) Indirectly from you (for example, from use of cookies and web beacons on our Website).

2. Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or

services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.

- To provide, support, personalize, and develop our website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

3. **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties: Service providers.

4. **Disclosures of Personal Information for a Business Purpose**

In the preceding twelve (12) months, Company has only disclosed personal information, specifically Category A: Identifiers, for a business purpose.

We disclose your personal information for a business purpose to the following categories of third parties: Service providers.

5. **Sales of Personal Information.** In the preceding twelve (12) months, Company has not sold personal information.

6. **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see ***Exercising Access, Data Portability, and Deletion***), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- sales, identifying the personal information categories that each category of recipient purchased; and
- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

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. Once we receive and confirm your verifiable consumer request (see **Exercising Access, Data Portability, and Deletion**), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of obligation conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

7. **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by:

Emailing us at webmaster@hillwood.com.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see **Personal Information Sales Opt-Out and Opt-In**.

8. **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. 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 consumer 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.

9. **Personal Information Sales Opt-Out and Opt-In Rights**

We do not sell your personal information. If that changes, we will provide you with additional information.

10. **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. We do not currently provide financial incentives.

11. **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not disclose your personal to third parties for the direct marketing purposes.

12. **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Hillwood Site and update the notice's effective date. **Your continued use of our website following the posting of changes constitutes your acceptance of such changes.**

13. **Enforcement Rights**. The Attorney General of the State of California may enforce these rights. You also have a private right of action should breach occur. For more information on your enforcement rights visit: <https://oag.ca.gov/privacy/ccpa>

14. **Contact Information**

If you have any questions or comments about this notice, the ways in which we collect and use your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: webmaster@hillwood.com