Cairn Communities Master Website Privacy Policy

Effective Date: January 1, 2026
Last Updated: August 23, 2026

1. Who We Are and Scope of This Policy

This Privacy Policy describes how **Cairn Communities, LLC**, doing business as Cairn Communities, and its affiliated companies, property-owning entities, property-management entities, home retail entities, and marketing brands collect, use, disclose, retain, and protect personal information.

For purposes of this Privacy Policy, "Cairn," "we," "us," and "our" include:

- Cairn Communities;
- The Reserve Communities;
- Northpoint Communities;
- The applicable Cairn-affiliated entity that owns, operates, manages, markets, leases, or sells homes within a particular community; and
- Service providers acting on behalf of those entities.

The Reserve Communities and Northpoint Communities are marketing brands used in connection with certain communities. They may not be separate legal entities. The legal entity responsible for a particular lease, home sale, financing arrangement, site lease, application, or other transaction will be identified in the applicable transaction documents.

This Privacy Policy applies to:

- `cairncommunities.com`;
- `thereservecommunities.com`;
- `thenorthpointcommunities.com`;
- Community-specific websites and landing pages operated by or on behalf of Cairn;
- Online inquiry, tour, contact, promotion, and interest-list forms;
- Online applications and resident or applicant portals, to the extent this Privacy Policy is displayed or linked there;
- Emails, text messages, telephone calls, chats, and other communications initiated through the websites; and
- Other Cairn digital services that link to this Privacy Policy.

Collectively, these are referred to as the "Sites."

Certain third-party services, including lender websites, background-screening services, credit-reporting services, payment processors, home-manufacturer websites, insurance providers, resident portals, and social-media platforms, may have their own privacy policies. This Privacy Policy does not replace those separate policies.

This Privacy Policy is intended primarily for individuals located in the United States. Separate notices may apply to employees, job applicants, vendors, and information collected solely in connection with an existing lease or employment relationship.

2. Notice at Collection

At or before the time personal information is collected, Cairn may collect the categories of information described below for the purposes identified in this Privacy Policy.

Depending on how you interact with us, the information may include:

- Identifiers and contact information;
- Housing inquiry and preference information;
- Application, screening, leasing, and home-purchase information;
- Financial and transaction-related information;
- Internet, device, cookie, and website-interaction information;
- Communications, including emails, chats, texts, and call information;
- Approximate location information;
- User-submitted content;
- Inferences about interests or housing preferences; and
- Sensitive personal information when necessary for an application, transaction, accommodation request, identity verification, or legal requirement.

We use this information to respond to inquiries, provide housing and home-purchase information, process applications and transactions, operate and improve the Sites, communicate with users, provide resident and customer service, conduct analytics and advertising, maintain security, and comply with law.

We retain personal information only for as long as reasonably necessary for the purposes described in this Privacy Policy, subject to legal, accounting, contractual, operational, and dispute-resolution requirements.

We do not sell personal information for money. Some Sites use analytics and advertising technologies that disclose identifiers, cookie information, internet activity, approximate location, or inferred interests to advertising or analytics partners. Certain state laws may define those disclosures as a “sale,” “sharing,” or processing for targeted advertising. Applicable opt-out choices are described below.

We do not sell sensitive personal information or biometric personal information. We do not use sensitive personal information for targeted advertising or to infer characteristics unrelated to the purpose for which it was collected.

Do not submit Social Security numbers, bank-account information, government identification numbers, medical information, or other highly sensitive information through a general contact, tour, or interest-list form. Use only a designated secure application or transaction portal when Cairn requests such information.

3. Categories of Personal Information We Collect

A. Identifiers and Contact Information

This may include:

- First and last name;
- Mailing or residential address;
- Email address;
- Telephone number;
- Online account or portal username;
- IP address;
- Device identifiers;
- Applicant, resident, customer, or lead identification numbers; and
- Similar identifiers.

B. Housing Interests and Preferences

This may include:

- Communities or locations of interest;
- Preferred home type, model, floor plan, price range, or number of bedrooms;
- Rental, home-purchase, RV-site, or other housing interests;
- Preferred move-in date;
- Tour or appointment preferences;
- Home manufacturer or builder preferences;
- Amenities or features of interest;
- Referral source; and
- Information included in questions, messages, or comments.

C. Application, Leasing, and Transaction Information

When you submit an application or begin a housing or home-purchase transaction, we may collect:

- Date of birth;
- Current and prior addresses;
- Employment and income information;
- Rental and housing history;
- Household and occupant information;
- References;
- Pet information;
- Vehicle information;
- Emergency-contact information;
- Application responses;
- Information relevant to residency qualifications;
- Lease, site-rent, home-rent, payment, and account information;
- Home-purchase and closing information;
- Information needed to verify identity or prevent fraud; and
- Documents you choose or are required to provide.

Application and transaction information may be collected directly by Cairn or through a secure third-party application, screening, payment, lender, title, escrow, or closing platform.

D. Financial and Credit-Related Information

Depending on the transaction, Cairn or an authorized third-party provider may collect:

- Income and employment verification;
- Payment-card or bank-account information;
- Credit-related information;
- Financing application information;
- Down-payment information;
- Tax-refund documentation submitted for a promotion;
- Payment history;
- Security-deposit information; and
- Other transaction-related financial information.

Financial institutions, lenders, credit-reporting agencies, payment processors, and other regulated providers may provide separate privacy notices governing information they collect or process.

E. Sensitive Personal Information

Depending on the circumstances, we may collect sensitive personal information, such as:

- Social Security number or other government identification number;
- Financial-account information;
- Information concerning citizenship or immigration status when lawfully required;
- Information relating to health, disability, or a reasonable-accommodation request;
- Information about service or assistance animals;
- Demographic information collected for a legally permitted purpose;
- Precise location information, if you affirmatively enable a feature that requires it; and
- Personal information relating to minor occupants provided by a parent, guardian, or adult applicant.

We collect and use sensitive personal information only when reasonably necessary for an authorized housing, transaction, security, legal, or accommodation-related purpose. Access is limited to personnel and service providers who need the information for that purpose.

We do not intentionally collect biometric identifiers through the Sites unless a separate notice and any legally required consent are provided.

F. Internet, Device, and Website-Usage Information

We and our service providers may automatically collect:

- IP address;
- Browser type;
- Device type;
- Operating system;
- Device or advertising identifiers;
- Referring and exit pages;
- Pages viewed;
- Links, buttons, and advertisements clicked;
- Search activity within the Sites;
- Date and time of access;
- Time spent on pages;
- Approximate geographic location derived from IP address;
- Form interactions;
- Session and conversion information;
- Cookie and pixel identifiers; and
- Diagnostic, performance, and security information.

G. Communications and Audio Information

We may collect and retain:

- Emails;
- Text messages;
- Web-form submissions;
- Chat communications;
- Customer-service notes;
- Voicemails;
- Call-routing and call-detail information;
- Call transcripts or summaries; and
- Telephone-call recordings when permitted by law and after any legally required notice is provided.

H. User-Submitted Content

This may include:

- Reviews and testimonials;
- Survey responses;
- Event or promotion submissions;
- Photographs or videos voluntarily submitted through the Sites;
- Comments and feedback; and
- Social-media content when you tag, mention, or communicate with a Cairn account.

Submitting identifiable photographs, video, testimonials, or promotional content may be subject to a separate photo, media, or testimonial release.

I. Inferences

We may draw limited inferences from information described above, such as:

- Likely community or home interests;
- Preferred price range;
- Likelihood of responding to a marketing communication;
- General engagement with a website or advertisement; and
- Communication preferences.

We do not use information collected solely through advertising cookies to determine whether an individual qualifies for housing or financing.

4. Sources of Personal Information

We may obtain personal information from:

- You directly;
- Other members of your household or an authorized representative;
- Cairn communities and affiliated entities;
- Community managers, sales representatives, and regional personnel;
- Online listing, lead-generation, or housing-search platforms;
- Advertising and social-media platforms;
- Referral partners;
- Home manufacturers, dealers, installers, and service providers;
- Lenders, brokers, title companies, escrow providers, and insurers;
- Application, screening, identity-verification, fraud-prevention, and credit-reporting providers;
- Payment processors;
- Analytics, advertising, communications, and website-service providers;
- Publicly available sources;
- Government agencies or records where legally permitted; and
- Business partners involved in a transaction you request.

5. How We Use Personal Information

We may use personal information to:

- Respond to inquiries;
- Send requested information about communities, homes, rentals, sales, RV sites, programs, and promotions;
- Add individuals to an interest list;
- Schedule tours, appointments, and events;
- Identify potentially relevant communities or housing options;
- Process and evaluate applications;
- Obtain or facilitate screening, credit, identity, employment, income, and rental-history information when authorized;
- Administer leases, site agreements, home-purchase transactions, reservations, and related documents;
- Facilitate communications with lenders, manufacturers, dealers, insurers, title companies, or other transaction partners;
- Process payments and maintain account records;
- Provide resident, applicant, and customer support;
- Manage maintenance, service, and community-related communications;

- Administer programs, promotions, events, surveys, and incentives;
- Send transactional or relationship communications;
- Send marketing communications where permitted;
- Personalize content and measure engagement;
- Analyze and improve the Sites, services, advertising, and operations;
- Conduct market research and campaign measurement;
- Maintain the security and integrity of systems, communities, transactions, and accounts;
- Detect, investigate, and prevent fraud, misuse, unlawful conduct, and security incidents;
- Enforce agreements and community policies;
- Protect the rights, property, safety, and interests of Cairn, residents, applicants, customers, employees, and others;
- Comply with legal, regulatory, licensing, tax, accounting, and recordkeeping requirements;
- Respond to subpoenas, court orders, government requests, and legal proceedings;
- Establish, exercise, or defend legal claims;
- Complete a merger, acquisition, financing, reorganization, or sale of assets; and
- Carry out another purpose disclosed when information is collected or with your consent.

We will not use personal information in a manner that violates applicable fair-housing, fair-lending, consumer-protection, or anti-discrimination laws.

6. How We Disclose Personal Information

We may disclose personal information to the following categories of recipients.

A. Cairn Affiliates and Community Entities

Information may be shared among Cairn Communities, affiliated ownership and management entities, The Reserve Communities, Northpoint Communities, and the applicable community personnel when reasonably necessary to respond to an inquiry or administer a transaction or relationship.

B. Service Providers and Contractors

We may use service providers for:

- Website hosting and maintenance;
- Customer-relationship management;
- Application and resident portals;
- Property-management software;

- Email, telephone, and text-message services;
- Call routing, transcription, and analytics;
- Payment processing;
- Data hosting and security;
- Marketing and advertising;
- Analytics and conversion measurement;
- Document management and electronic signatures;
- Application, screening, identity-verification, and fraud-prevention services;
- Legal, accounting, insurance, audit, and professional services; and
- Other business-support functions.

These providers are permitted to use information only as allowed by their agreements with us and applicable law.

C. Housing and Transaction Partners

At your request, with your consent, or as reasonably necessary to complete a transaction, information may be disclosed to:

- Lenders and financing providers;
- Home manufacturers and dealers;
- Installers and contractors;
- Title, escrow, closing, and settlement providers;
- Insurance providers;
- Utility or service providers;
- Background, credit, and rental-history screening providers; and
- Other parties involved in an application, lease, home purchase, or financing transaction.

D. Analytics and Advertising Partners

Some Sites use analytics, advertising, and social-media technologies. These partners may receive cookie identifiers, device identifiers, IP addresses, approximate location, internet activity, conversion events, and inferred interests.

These disclosures may be considered a sale, sharing, or targeted advertising under certain state privacy laws, even though Cairn does not receive money in exchange for the information.

E. Government Authorities and Legal Recipients

We may disclose information when we reasonably believe disclosure is necessary to:

- Comply with law;

- Respond to a subpoena, court order, warrant, or government request;
- Cooperate with regulators, licensing authorities, or law enforcement;
- Investigate fraud, safety threats, or unlawful conduct;
- Protect legal rights or enforce agreements; or
- Protect the safety of individuals or property.

F. Business Transactions

Information may be transferred in connection with an actual or proposed merger, acquisition, financing, sale, restructuring, bankruptcy, or transfer of all or part of a business or property portfolio.

G. With Your Direction or Consent

We may disclose information to another person or entity when you direct us to do so or provide consent.

7. Sale, Sharing, and Targeted Advertising

Cairn does not sell personal information in exchange for money.

Some advertising and analytics practices may be defined as a "sale," "sharing," or targeted advertising under applicable state law. The categories potentially involved are:

- Identifiers, such as cookie IDs, device IDs, and IP addresses;
- Internet or electronic-network activity;
- Approximate location information; and
- Inferences regarding interests or engagement.

The recipients may include:

- Advertising networks;
- Social-media platforms;
- Analytics providers; and
- Marketing-technology providers.

You may opt out of these practices through the **"Your Privacy Choices"** or **"Do Not Sell or Share My Personal Information"** link in the website footer or through our cookie-preference tool.

We do not knowingly sell or share the personal information of individuals under 16 for targeted advertising.

We do not sell sensitive personal information or biometric personal information.

8. Cookies and Similar Technologies

The Sites may use:

- Strictly necessary cookies;
- Functional cookies;
- Preference cookies;
- Analytics cookies;
- Advertising cookies;
- Web beacons;
- Pixels;
- Tags;
- Software-development kits; and
- Similar technologies.

These technologies may be used to:

- Operate the Sites;
- Remember preferences;
- maintain security;
- understand website traffic;
- identify technical problems;
- measure advertising;
- understand whether an inquiry resulted from a campaign;
- personalize content; and
- support targeted advertising.

You may manage nonessential cookies using the cookie-preference tool available on the Sites. You may also adjust browser settings, although blocking some cookies may prevent portions of a Site from functioning properly.

Where required by law and supported by our systems, we recognize legally valid browser-based opt-out preference signals, such as Global Privacy Control, as a request to opt out of sale, sharing, or targeted advertising for the browser or device sending the signal.

Because browser “Do Not Track” signals do not operate under a uniform industry standard, the Sites may not respond to those signals unless applicable law requires otherwise.

Specific cookies, providers, purposes, and expiration periods should be identified in the applicable Site’s cookie-preference center or Cookie Notice.

9. Email, Text Messages, and Telephone Communications

Marketing Email

You may unsubscribe from marketing emails by using the unsubscribe link contained in the message. Even after opting out of marketing emails, you may continue to receive transactional or relationship communications concerning an inquiry, application, lease, account, payment, transaction, or resident matter.

Text Messages

Where you affirmatively opt in to receive text messages:

- Message frequency may vary;
- Message and data rates may apply;
- Consent to receive marketing text messages is not a condition of purchasing a home, renting a home, leasing a homesite, applying for residency, or obtaining financing;
- You may opt out by replying **STOP** or by using another reasonable method described in the message; and
- You may reply **HELP** for assistance where supported.

Cairn does not sell SMS opt-in consent or mobile telephone information to unaffiliated third parties for their independent marketing. We may disclose mobile information to affiliates and service providers that help us send or administer communications you requested.

Telephone Calls

Calls may be monitored or recorded for quality assurance, training, security, documentation, and customer-service purposes where permitted by law. Any legally required notice will be provided at or before recording.

10. Data Retention

We retain personal information only for as long as reasonably necessary for the disclosed purposes.

Retention is generally determined as follows:

- **Inquiry and contact information:** For the duration of the inquiry and a reasonable follow-up period, taking into account marketing preferences, the nature of the request, and applicable legal requirements.
- **Application and screening information:** For the period required to process the application, document the decision, respond to disputes, and satisfy fair-housing, consumer-reporting, licensing, and recordkeeping obligations.

- **Lease, resident, and transaction information:** For the duration of the relationship and the period reasonably necessary for accounting, tax, contractual, operational, warranty, dispute, and legal requirements.
- **Financing and purchase information:** For the transaction period and any additional period required by lending, title, tax, licensing, warranty, consumer-protection, or recordkeeping laws.
- **Communications and call records:** For as long as reasonably necessary to document the communication, provide service, resolve disputes, monitor quality, or comply with law.
- **Cookie and website information:** In accordance with the applicable cookie's duration, the configuration of the relevant technology, and legal requirements.
- **Security logs:** For as long as reasonably necessary to detect, investigate, and prevent security incidents or misuse.
- **Sensitive personal information:** No longer than reasonably necessary for the specific transaction, legal, accommodation, identity, security, or application purpose for which it was collected.
- **Legal-hold information:** For as long as required to preserve information relevant to anticipated or pending litigation, investigation, audit, or legal proceeding.

We may retain deidentified or aggregated information that cannot reasonably be linked to an individual.

11. Data Security

We use reasonable administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, destruction, loss, alteration, use, or disclosure.

Safeguards may include access controls, authentication, encryption where appropriate, vendor management, employee training, monitoring, backups, and incident-response procedures.

No method of transmitting or storing information is completely secure. Cairn cannot guarantee absolute security.

You should not send highly sensitive information by ordinary email, text message, or general website form.

12. U.S. State Privacy Rights

Depending on your state of residence and whether the applicable law covers Cairn and the information involved, you may have the right to:

- Confirm whether we process your personal information;
- Access personal information we maintain about you;

- Obtain a copy of certain personal information;
- Correct inaccuracies;
- Delete certain personal information;
- Obtain personal information in a portable format;
- Opt out of the sale of personal information;
- Opt out of sharing for cross-context behavioral advertising;
- Opt out of targeted advertising;
- Opt out of certain profiling used to make a legal or similarly significant decision;
- Limit certain uses or disclosures of sensitive personal information;
- Withdraw consent where processing is based on consent;
- Obtain information about categories of personal information, sources, purposes, and recipients;
- Use an authorized agent to make certain requests; and
- Appeal a decision concerning a privacy request.

These rights are subject to legal exceptions. For example, we may retain information needed to complete a transaction, comply with law, exercise legal rights, prevent fraud, maintain security, or administer an existing relationship.

How to Submit a Privacy Request

You may submit a request through one of the following methods:

- **Online privacy request form:** [PRIVACY REQUEST FORM URL]
- **Email:** [PRIVACY EMAIL ADDRESS]
- **Telephone:** [TOLL-FREE PRIVACY REQUEST NUMBER]
- **Mail:** Privacy Office, Cairn Communities, 720 South Colorado Boulevard, Suite 1150-N, Glendale, Colorado 80246

Please describe the request and provide enough information for us to identify the relevant records.

Verification

We may take reasonable steps to verify your identity before fulfilling a request. Verification may depend on the sensitivity and nature of the request.

We will not request more information than is reasonably necessary for verification. Information collected for verification will be used for that purpose and related security or legal obligations.

Authorized Agents

Where permitted, you may designate an authorized agent to submit a request. We may require evidence of the agent's authority and may contact you directly to verify the request.

Appeals

If we deny a privacy request, you may appeal by using the same request methods and writing **"Privacy Appeal"** in the subject line or request description.

We will respond within the period required by applicable law. If an appeal is denied, we will provide information about any additional complaint process required by your state.

Nondiscrimination

We will not unlawfully discriminate against you for exercising a privacy right. Exercising a privacy right will not affect your eligibility for housing, homeownership, financing, or services, except where the requested information is reasonably necessary to provide the requested service or complete a transaction.

13. Additional Information for California Residents

This section applies only if the California Consumer Privacy Act applies to Cairn's processing of your personal information.

During the preceding 12 months, Cairn may have collected the categories of personal information described in Section 3 from the sources described in Section 4 and used them for the purposes described in Section 5.

Cairn may have disclosed those categories for business purposes to the recipients described in Section 6.

Through analytics and advertising technologies, Cairn may have sold or shared, as those terms are defined under California law:

- Identifiers;
- Internet or electronic-network activity;
- Approximate geolocation information; and
- Inferences.

Cairn does not sell personal information for money and does not sell or share sensitive personal information for cross-context behavioral advertising.

California residents may have the right to:

- Know the categories and specific pieces of personal information collected;
- Know the sources, purposes, and categories of recipients;
- Request correction or deletion;

- Opt out of sale or sharing;
- Limit certain uses of sensitive personal information; and
- Receive equal service and pricing after exercising a privacy right.

Cairn does not offer a financial incentive in exchange for personal information unless the program is described in a separate financial-incentive notice. Housing promotions, concessions, or home-purchase programs are not data-related financial incentives merely because eligibility information is collected to administer them.

14. Children and Minor Occupants

The Sites are intended for adults and are not directed to children under 13. We do not knowingly collect personal information directly from children under 13 through general website functions.

An adult applicant or resident may provide limited information about minor occupants when reasonably necessary for an application, lease, emergency contact, household record, or legally required purpose.

If you believe a child submitted personal information directly to a Site without appropriate authorization, contact us so we can review and, where appropriate, delete it.

15. Third-Party Websites and Services

The Sites may link to third-party websites and services. Cairn does not control the privacy or security practices of those third parties.

Examples may include:

- Resident portals;
- Application platforms;
- Lender or financing websites;
- Home manufacturers;
- Insurance providers;
- Payment processors;
- Mapping and directions services;
- Social-media platforms;
- School or neighborhood-information providers; and
- External review sites.

You should review the privacy policy of each third party before providing personal information.

16. Information Processed Outside Your State

Personal information may be processed in states other than the state where it was collected. Service providers may process information in the United States or other jurisdictions where they operate.

When required, we use contractual and other safeguards designed to protect information transferred to service providers.

17. Changes to This Privacy Policy

We may update this Privacy Policy to reflect changes in law, technology, business practices, or the Sites.

The updated version will be posted with a revised “Last Updated” date. If a change is material, we may provide additional notice where required.

Changes apply prospectively from the stated effective date.

18. Contact Us

Questions about this Privacy Policy or Cairn’s privacy practices may be directed to:

Cairn Communities
720 South Colorado Boulevard, Suite 1150-N
Glendale, Colorado 80246

Email: info@cairncommunities.com
Telephone: 303-407-3000

To request this Privacy Policy in an alternative format, contact us using the information above.