

# Privacy Policy

Effective February 6, 2026

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CVL Management (“CVL,” “we,” “us,” or “our”) is an Iowa-based residential property management company. This Privacy Policy explains how we collect, use, disclose, and safeguard personal data of rental applicants, tenants, property owners, guarantors, and other individuals who interact with us (“consumers”).

This policy is intended to promote transparency and describe our practices under applicable law, including the Iowa Consumer Data Protection Act (Iowa Code Chapter 715D) where applicable, as well as relevant federal laws such as the Fair Credit Reporting Act (FCRA).

## 1. Scope of This Policy

This Privacy Policy applies to personal data we process in connection with residential property management services, including rental applications, leasing, tenancy administration, communications, and maintenance coordination.

This policy does not apply to information that is publicly available, de-identified, or aggregated such that it cannot reasonably be linked to an individual, or to information governed by separate legal notices or disclosures (such as FCRA authorizations and adverse action notices).

## 2. Categories of Personal Data We Collect

Depending on your relationship with CVL, we may collect and process the following categories of personal data:

- Contact Information: name, mailing address, email address, phone number
- Application and Tenancy Information: rental applications, lease details, payment status, household information, communications
- Tenant Screening Information: credit reports, background check results, eviction history, and related data obtained and used in compliance with the FCRA
- Communication Data: emails, text messages, phone calls, maintenance requests
- Account and Portal Information: information submitted through tenant or applicant portals, including AppFolio
- Other Information You Provide: information voluntarily provided when contacting us

We do not knowingly collect sensitive personal data except where reasonably necessary to evaluate a rental application, manage a tenancy, or comply with legal obligations.

## 3. Sources of Personal Data

- We may collect personal data from:
- You directly (applications, leases, payments, communications, portals)
- Property management platforms and service providers (such as AppFolio)
- Consumer reporting agencies and screening providers, where authorized
- Vendors and contractors supporting our operations
- Public records, where relevant and permitted by law

#### 4. Purposes for Processing Personal Data

We process personal data for purposes including:

- Processing rental applications and evaluating eligibility
- Conducting tenant screening in compliance with the FCRA
- Drafting, executing, and administering leases and related agreements
- Managing tenant relationships and rental accounts
- Coordinating maintenance, inspections, and property access
- Communicating with tenants, applicants, and property owners
- Sending service-related notifications, reminders, and updates (including SMS, where consent is provided)
- Maintaining business records and complying with legal obligations
- Protecting the security and integrity of our operations

We do not use solely automated decision-making to make decisions that produce legal or similarly significant effects without human involvement.

#### 5. Text Messaging and Electronic Communications

If you choose to provide your phone number and opt in to receive text messages from CVL:

- Messages may include maintenance coordination, application updates, lease-related notices, reminders, and other property-management communications
- Message frequency may vary
- Message and data rates may apply
- Consent to receive text messages is not a condition of renting or applying for housing

#### 6. Disclosure of Personal Data to Third Parties

We do not sell personal data. SMS consent is not shared with third parties or affiliates for marketing purposes.

We may disclose personal data to the following categories of third parties solely as necessary to operate our business:

- **Property management and technology providers** (e.g., AppFolio)
- **Communication service providers** (e.g., phone, SMS, email platforms)
- **Tenant screening and consumer reporting agencies**, where authorized
- **Maintenance vendors and contractors**, as necessary to fulfill service requests
- **Professional advisors**, including legal, accounting, and insurance providers
- **Government authorities or courts**, when required by law or legal process

Service providers are required to use personal data only for authorized purposes and to maintain appropriate safeguards.

#### 7. Tenant Screening and the Fair Credit Reporting Act

When we obtain consumer reports or tenant screening information, we do so for permissible purposes under the Fair Credit Reporting Act (FCRA). Required disclosures and written authorizations are provided separately where applicable.

If we take an adverse action based in whole or in part on information contained in a consumer report, we will provide the required adverse action notice in accordance with the FCRA.

## **8. Consumer Rights Under Iowa Law**

If the Iowa Consumer Data Protection Act applies to CVL, Iowa residents may have the right to:

- Confirm whether we are processing their personal data
- Access their personal data
- Delete personal data they have provided to us
- Obtain a copy of their personal data in a portable format
- Opt out of the sale of personal data (CVL does not sell personal data)

To exercise these rights, please contact us using the information in Section 11 below. We may need to verify your identity before responding.

## **9. Appeals Process**

If we deny a consumer request regarding personal data, the consumer may appeal our decision by submitting an appeal request using the contact information below. We will review and respond to appeals in accordance with applicable law.

## **10. Data Security and Retention**

We maintain reasonable administrative, technical, and physical safeguards designed to protect personal data from unauthorized access, disclosure, alteration, or misuse. No system can be guaranteed to be completely secure.

We retain personal data only for as long as reasonably necessary to fulfill the purposes described in this policy, comply with legal and recordkeeping obligations, resolve disputes, and enforce agreements.

## **11. SMS Terms & Conditions**

By providing your phone number and opting in through a web form, application, lease document, or other medium, you agree to receive SMS messages from CVL Management.

These messages may include:

- Rental application updates
- Lease and account notifications
- Maintenance coordination and service updates
- Appointment reminders
- General property-related communications

Messaging frequency may vary.

Message and data rates may apply.

To opt out at any time, text STOP.

For assistance, text HELP or visit our website at:

<https://www.cedarvalleyliving.com/>

## **12. Children's Information**

Our services are intended for adults. We do not knowingly collect personal data from children under the age of 13. If we learn that such information has been collected without appropriate consent, we will take reasonable steps to delete it.

## **13. Changes to This Policy**

We may update this Privacy Policy from time to time. Updates will be posted in a reasonably accessible manner, and the "Last Updated" date will be revised accordingly.

## **14. Contact Information**

If you have questions about this Privacy Policy or wish to exercise your rights, please contact:

### **CVL Management**

**Email:** [corporate@cedarvalleyliving.com](mailto:corporate@cedarvalleyliving.com)

**Phone:** (319)743-1945