

10 Wilmington Place

Consumer Privacy Policy

Effective Date: September 15, 2026

10 Wilmington Place (“10 WP,” “we,” “our,” or “us”) is operated by 10WP, Inc., an Ohio corporation providing senior living services at our community located at 10 Wilmington Avenue, Dayton, Ohio 45420. This Privacy Policy describes how we collect, use, disclose, and protect your personal information when you visit our website at www.10wilmingtonplace.com, inquire about our services, communicate with us, or otherwise provide personal information to us.

By using our website or providing personal information to us, you acknowledge that you have read and understood this Privacy Policy. If you have any questions or concerns, please contact us at info@10wilmingtonplace.com or (937) 253-1010.

1. Our Information Practices

a. Categories of Information We Collect

The following table describes the categories of personal information we collect and examples of the data within each category:

Category of Data	Examples
Identifiers	First and last name, email address, phone number, mailing address, postal code
Contact and Inquiry Information	Tour scheduling requests, contact form submissions, relationship to prospective resident (e.g., spouse, adult child), preferred tour date/time
Internet or Network Activity	IP address, browser type and version, pages visited on our website, date and time of visit, referring website, device type
Geolocation Data (General)	Approximate location inferred from IP address (city/state level only; we do not collect precise geolocation)
Marketing and Communications Data	Email communication preferences, opt-in/opt-out status, marketing email interaction data (opens, clicks)
Advertising and Analytics Data	Cookie identifiers, pixel data, advertising interactions, data collected by Meta (Facebook) pixel, Google Ads pixel, and Google Analytics

b. Sources of Personal Information. We collect personal information from the following sources:

- Directly from you, when you fill out a form on our website (e.g., “Schedule a Tour,” “Contact Us”), call us, email us, or otherwise communicate with us;

- Automatically, when you visit our website, through cookies, pixels, and similar technologies operated by us and our third-party analytics and advertising partners;
- From referral partners, such as senior living referral services, when you express interest in our community through their platform; and
- From our service providers, such as our website platform and marketing vendors, in connection with the services they provide to us.

c. Purposes for Collecting Personal Information

We may use the personal information we collect for the following purposes:

- To respond to your inquiries and provide information about our community, services, and amenities;
- To schedule and manage tours of our community;
- To communicate with you about our services, events, and updates;
- To send marketing and promotional communications where you have provided consent or where otherwise permitted by law;
- To operate, maintain, and improve our website;
- To analyze website usage and trends through analytics tools;
- To deliver targeted advertising through third-party platforms (such as Meta and Google);
- To detect, prevent, and respond to fraud, security incidents, or other harmful activities;
- To comply with legal obligations;
- To defend or exercise legal claims; and
- To the extent we may be involved in any large corporate transaction involving a merger or an acquisition of our assets and liabilities.

d. Disclosure of Personal Information to Third Parties and Service Providers

We may disclose your personal information to the following categories of third parties and service providers:

Website and Technology Providers: We use third-party platforms for website content management and marketing automation. These providers process personal information on our behalf to help us manage our website, forms, and communications. Our website is managed by an external marketing vendor.

Analytics Providers: We use Google Analytics and other providers to understand how visitors interact with our website. These services collect information about your browsing behavior using cookies and similar technologies.

Advertising Partners: We use Meta (Facebook) Ads and Google Ads, which involve the use of tracking pixels on our website. These pixels may transmit certain browsing and interaction data to Meta and Google to help us measure ad performance and deliver relevant advertising.

Management Company: Our operations are managed by a management company, which may access personal information in the course of providing management services to our community.

Referral Partners: We may partner with senior living referral services, which may share information about prospective residents who express interest in our community.

Legal and Regulatory: We may disclose personal information when required by law, regulation, legal process, or governmental request, or to protect the rights, property, or safety of our residents, staff, or others.

e. Sale or Sharing of Personal Information

We do not sell your personal information in exchange for money. However, we use cookies and similar technologies, including Meta (Facebook) pixels and Google Ads, which may transmit certain information about your browsing activity to these platforms. Under some state laws, this transmission of data to third-party advertising platforms is defined a “sale” or “sharing” of personal information. The categories of personal information that may be disclosed in this manner include: internet or network activity information (such as browsing history on our site), device identifiers, and advertising identifiers. As a small business in Ohio, we do not meet the thresholds of applicability of these state privacy laws. That said, we provide a cookie banner on our website to allow you to reject optional cookies.

f. Cookies and Other Tracking Technologies

Our website uses cookies and similar tracking technologies to enhance your experience and to help us understand how our website is used. The types of technologies we use include:

Essential Cookies: These are necessary for the website to function properly (e.g., maintaining session state, enabling form submissions).

Analytics Cookies: We use Google Analytics to collect information about how visitors interact with our website, including pages visited, time spent on pages, and general traffic patterns. This helps us improve our website and services.

Advertising Cookies/Pixels: We use Meta (Facebook) pixel and Google Ads pixel to measure the effectiveness of our advertising campaigns, deliver relevant advertisements, and build custom audiences. These technologies may collect information about your browsing activity across websites.

Managing Your Preferences: Our website features a cookie banner allowing you to opt out of optional cookies. Most web browsers allow you to control cookies through their settings. You can typically set your browser to refuse all cookies or to indicate when a cookie is being set. However, some features of our website may not function properly if cookies are disabled. You may also opt out of interest-based advertising by visiting the Digital Advertising Alliance’s opt-out page at www.aboutads.info/choices or the Network Advertising Initiative at www.networkadvertising.org/choices.

g. How Long Your Personal Information Will Be Kept

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including to satisfy legal, accounting, or reporting requirements. In determining the

appropriate retention period, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and applicable legal requirements.

When personal information is no longer needed for the purposes for which it was collected, we will delete or de-identify it in accordance with our internal practices.

h. Keeping Your Personal Information Secure

We implement safeguards designed to protect personal information from unauthorized access, use, alteration, or destruction. While no system is completely secure, we take reasonable steps to protect the personal information in our care.

While we take reasonable steps to protect your personal information, no method of transmission over the internet or method of electronic storage is 100% secure. We cannot guarantee absolute security of your information.

i. Websites Operated by Third Parties

Our website may contain links to third-party websites, including our social media pages, referral partner pages, and other external sites. This Privacy Policy does not apply to those third-party websites. We encourage you to review the privacy policies of any third-party websites you visit. We are not responsible for the privacy practices or content of third-party websites.

2. Your Privacy Rights and Choices

Some state privacy laws provide consumers with certain rights regarding your personal information. Ohio does not currently have a comprehensive privacy law, and, as a small business in Ohio, we do not meet the threshold applicability requirements for other state privacy laws. That said, we value your privacy and would be happy to assist you with your questions on how we use your data, or to delete your data at your request. If you have any questions or concerns, please contact us at info@10wilmingtonplace.com or (937) 253-1010.

When you submit a request, we may need to verify your identity before processing it. We will attempt to verify your identity by matching the information you provide with information we already have on file. We will endeavor to respond to your request within a reasonable timeframe.

At our discretion, we may accept requests submitted by an authorized agent on your behalf. If you use an authorized agent, we may require verification of the agent's authority (such as a power of attorney or signed written authorization) in addition to verifying your identity.

3. Marketing Communications

We may send you marketing communications about our community, services, events, and other offerings if you have opted in to receive such communications or where permitted by law. Marketing communications may be sent to individuals who have submitted a form on our website, residents and their families, or individuals who have expressed interest in our community by phone or other means.

Opting Out: You may opt out of receiving marketing emails at any time by clicking the “unsubscribe” link included in each marketing email, or by contacting us at info@10wilmingtonplace.com. Please note that even if you opt out of marketing communications, we may still send you non-promotional messages, such as communications about your relationship with our community or responses to your specific inquiries.

4. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. When we make material changes to this Privacy Policy, we will notify you by posting the updated policy on our website with a revised “Last Updated” date at the top. If the changes are significant, we will also provide additional notice, such as by sending an email to the address associated with your account or by posting a prominent notice on our website. We encourage you to periodically review this page for the latest information on our privacy practices.

5. Contact Information

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

10 Wilmington Place

Attn: Privacy Inquiries

10 Wilmington Avenue

Dayton, Ohio 45420

Phone: (937) 253-1010

Email: info@10wilmingtonplace.com