

# CubeSmart Privacy Notice for California Residents

For residents of the State of California (“consumers” or “you”), this Privacy Notice for California Residents (“Notice”) supplements the information contained in the Privacy Policy available on the website or mobile application from which you accessed this Notice (the “Site”), and in any other privacy notice we provided to you at the point where we collect your personal information. California’s Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (the “CPRA”) requires that we tell you about the categories of personal information collected by CubeSmart and its affiliates (“CubeSmart”, “we”, “us” or “our”), the sources from which we collect personal information, the categories of your personal information that we use, disclose, sell or share, and the kinds of third parties with whom we disclose, sell or share your personal information. We have set out that information in this Notice to comply with the CPRA and any terms defined in the CPRA have the same meaning when used in this Notice.

**Please note that this Notice does not apply to personal information that we collect from employees or job applicants, or from owners, directors, officers, or contractors of CubeSmart. If you are an employee, job applicant or owner, director, officer, or contractor of CubeSmart, please see our [CPRA Employee/Applicant/Contractor Notice](#).**

## I. Data Collection Notice

CubeSmart collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household (“personal information”). In particular, we collect the categories of personal information specified below. CubeSmart may use, sell, share, or disclose these categories of personal information for one or more of the following business or commercial purposes.

<i>Categories</i>	<i>Description</i>	<i>Purpose</i>
<b>Identifiers</b>	A real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver’s license number	<ul style="list-style-type: none"> <li>• To fulfill the reason you provided the information, such as responding to your inquiries regarding a rental unit, evaluating and processing your rental application, and verifying your information.</li> <li>• To maintain, customize, and secure your account with us, and process your requests, purchases, transactions, and payments.</li> <li>• To conduct our business, fulfill our legal obligations, and develop and improve our websites, applications, products, and services.</li> <li>• To develop and carry out marketing activities in order to keep our customers informed about our products and services.</li> <li>• To personalize your consumer experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Site, third-party sites, and via email or text message.</li> <li>• To facilitate consumer transactions with unaffiliated third-party storage companies that are part of the CubeSmart network.</li> <li>• To resolve disputes and enforce our agreements, establish or exercise our legal rights, or defend against legal claims.</li> <li>• To help maintain the safety, security, and integrity of our websites, systems, products, services, databases and other technology assets, properties, and business.</li> <li>• To evaluate or conduct a merger, divestiture, reorganization, dissolution, or other sale or transfer of some or all of our business or assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets or business transferred.</li> <li>• To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</li> <li>• As described to you when collecting your personal information.</li> </ul>
<b>Categories listed in the California Customer Records statute</b>	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.	
<b>Protected classification characteristics under California or federal law</b>	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).	
<b>Commercial information</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	
<b>Internet or similar network activity</b>	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	
<b>Geolocation data</b>	Geolocation data	
<b>Sensory data</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	
<b>Professional or employment-related information</b>	Current or past job history or performance evaluations.	
<b>Inferences drawn from other personal information</b>	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	
<b>Sensitive personal information</b>	Personal information that reveals Social Security, driver’s license, state identification card, or passport number	

## II. Sources of Data and Data Disclosures

The chart below shows the categories of sources of the personal information that we use, whether we disclose, sell or share the personal information we collect, the third parties with whom we disclose, sell or share that information and the purposes we sell or share information.

<i>Categories Collected</i>	<i>Sources of Collection of Personal Information</i>	<i>Disclosed for a Business or Commercial Purpose?</i>	<i>Categories of Third Parties with Which We Disclose Personal Information</i>	<i>Sold or Shared?</i>	<i>Categories of Third Parties to Whom the Personal Information is Sold or Shared</i>	<i>Purpose(s) for Selling or Sharing</i>
<b>Identifiers (including, without limitation, a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number)</b>	<ul style="list-style-type: none"> <li>You (directly)</li> <li>Service providers</li> <li>Third parties</li> <li>Consumer reporting agencies</li> <li>Public records</li> <li>Referral sources</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Service Providers</li> <li>Debt-collectors and payment processors</li> <li>Consumer reporting agencies</li> <li>Government agencies or law enforcement to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others</li> <li>Buyers/acquirors in the event of a corporate transaction, including but not limited to a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy</li> <li>As directed by you</li> </ul>	No, except for IP address as described in the <b>"Internet or similar network activity"</b> category below.	N/A	N/A
<b>Categories listed in Cal. Civ. Code § 1798.80(e) (including, without limitation, 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)</b>	<ul style="list-style-type: none"> <li>You (directly)</li> <li>Service providers</li> <li>Third parties</li> <li>Consumer reporting agencies</li> <li>Public records</li> <li>Referral sources</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Service Providers</li> <li>Debt-collectors and payment processors</li> <li>Consumer reporting agencies</li> <li>Government agencies or law enforcement</li> <li>Buyers/acquirors</li> <li>As directed by you</li> </ul>	No	N/A	N/A

<i>Categories Collected</i>	<i>Sources of Collection of Personal Information</i>	<i>Disclosed for a Business or Commercial Purpose?</i>	<i>Categories of Third Parties with Which We Disclose Personal Information</i>	<i>Sold or Shared?</i>	<i>Categories of Third Parties to Whom the Personal Information is Sold or Shared</i>	<i>Purpose(s) for Selling or Sharing</i>
<b>Protected classification characteristics under California or federal law (including, without limitation, 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)</b>	<ul style="list-style-type: none"> <li>• You (directly)</li> <li>• Service providers</li> <li>• Third parties</li> <li>• Consumer reporting agencies</li> <li>• Public records</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Consumer reporting agencies</li> <li>• Government agencies or law enforcement</li> <li>• Buyers/acquirors</li> <li>• As directed by you</li> </ul>	No	N/A	N/A
<b>Commercial information (including, without limitation, Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)</b>	<ul style="list-style-type: none"> <li>• You (directly)</li> <li>• Service providers</li> <li>• Third parties</li> <li>• Consumer reporting agencies</li> <li>• Public records</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Debt-collectors and payment processors</li> <li>• Consumer reporting agencies</li> <li>• Government agencies or law enforcement</li> <li>• Buyers/acquirors</li> <li>• As directed by you</li> </ul>	No	N/A	N/A

<i>Categories Collected</i>	<i>Sources of Collection of Personal Information</i>	<i>Disclosed for a Business or Commercial Purpose?</i>	<i>Categories of Third Parties with Which We Disclose Personal Information</i>	<i>Sold or Shared?</i>	<i>Categories of Third Parties to Whom the Personal Information is Sold or Shared</i>	<i>Purpose(s) for Selling or Sharing</i>
<b>Internet or similar network activity (such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement)</b>	<ul style="list-style-type: none"> <li>You (indirectly, through passive technologies on the Internet, such as cookies)</li> <li>Service providers</li> <li>Third parties</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Service providers</li> <li>Government agencies or law enforcement</li> <li>Buyers/acquirors</li> <li>As directed by you</li> </ul>	Yes	Third-party website analytics and digital advertising service providers	<ul style="list-style-type: none"> <li>To maintain, customize, and secure your account with us.</li> <li>To conduct our business, fulfill our legal obligations, and develop and improve our websites, applications, products, and services.</li> <li>To develop and carry out marketing activities in order to keep our customers informed about our products and services.</li> <li>To personalize your consumer experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Site, third-party sites, and via email or text message.</li> <li>To resolve disputes and enforce our agreements, establish or exercise our legal rights, or defend against legal claims.</li> <li>To help maintain the safety, security, and integrity of our websites, systems, products, services, databases and other technology assets, properties, and business.</li> <li>To evaluate or conduct a merger, divestiture, reorganization, dissolution, or other sale or transfer of some or all of our business or assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets or business transferred.</li> <li>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</li> <li>As described to you when collecting your personal information.</li> </ul>
<b>Geolocation data</b>	<ul style="list-style-type: none"> <li>You (indirectly, through passive technologies on the Internet, such as cookies)</li> <li>Service providers</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Service providers</li> <li>Government agencies or law enforcement</li> <li>Buyers/acquirors</li> <li>As directed by you</li> </ul>	Yes	Third-party website analytics and digital advertising service providers	<ul style="list-style-type: none"> <li>To maintain, customize, and secure your account with us.</li> <li>To conduct our business, fulfill our legal obligations, and develop and improve our websites, applications, products, and services.</li> <li>To develop and carry out marketing activities in order to keep our customers informed about our products and services.</li> <li>To personalize your consumer experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Site, third-party sites, and via email or text message.</li> <li>To resolve disputes and enforce our agreements, establish or exercise our legal rights, or defend against legal claims.</li> <li>To help maintain the safety, security, and integrity of our websites, systems, products, services, databases and other technology assets, properties, and business.</li> <li>To evaluate or conduct a merger, divestiture, reorganization, dissolution, or other sale or transfer of some or all of our business or assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets or business transferred.</li> <li>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</li> <li>As described to you when collecting your personal information.</li> </ul>
<b>Sensory data (such as audio, electronic, visual, thermal, olfactory, or similar information)</b>	<ul style="list-style-type: none"> <li>You (indirectly, when calls are recorded for quality assurance purposes)</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Service providers</li> <li>Government agencies or law enforcement</li> <li>Buyers/acquirors</li> </ul>	No	N/A	N/A

<i>Categories Collected</i>	<i>Sources of Collection of Personal Information</i>	<i>Disclosed for a Business or Commercial Purpose?</i>	<i>Categories of Third Parties with Which We Disclose Personal Information</i>	<i>Sold or Shared?</i>	<i>Categories of Third Parties to Whom the Personal Information is Sold or Shared</i>	<i>Purpose(s) for Selling or Sharing</i>
<b>Professional or employment-related information (such as current or past job history or performance evaluations)</b>	<ul style="list-style-type: none"> <li>You (directly)</li> <li>Service providers</li> <li>Third parties</li> <li>Consumer reporting agencies</li> <li>Public records</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Service providers</li> <li>Debt-collectors and payment processors</li> <li>Consumer reporting agencies</li> <li>Government agencies or law enforcement</li> <li>Buyers/acquirors</li> <li>As directed by you</li> </ul>	No	N/A	N/A
<b>Inferences drawn from other personal information (such as to create a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes)</b>	<ul style="list-style-type: none"> <li>You (directly)</li> <li>Service providers</li> <li>Third parties</li> <li>Consumer reporting agencies</li> <li>Public records</li> <li>Referral sources</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Service providers</li> <li>Government agencies or law enforcement</li> <li>Buyers/acquirors</li> <li>As directed by you</li> </ul>	No	N/A	N/A
<b>Sensitive personal information (personal information that reveals Social Security, driver's license, state identification card, or passport number)</b>	<ul style="list-style-type: none"> <li>You (directly)</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Service providers</li> <li>Government agencies or law enforcement</li> <li>Buyers/acquirors</li> <li>As directed by you</li> </ul>	No	N/A	N/A

Please note that CubeSmart does not use or disclose sensitive personal information for any purpose other than those permitted under the CPRA.

We will retain the personal information, including the sensitive personal information, listed above for as long as necessary to fulfil the purpose for which it was collected, or as required by applicable laws or regulation.

### III. California Rights and Choices

Subject to certain restrictions, the CPRA gives California residents certain rights to request access to personal information that CubeSmart has about you, to request deletion of your personal information, to correct inaccurate personal information, to limit the use and disclosure of your sensitive personal information and to opt-out of the sale or sharing of your personal information. This section describes how you can exercise those rights and our process for handling your requests.

#### a. Right to Request Access to Your Personal Information

California residents have the right to request a copy of the following: (1) the categories of personal information we collected about you; (2) the categories of sources from which the personal information is collected; (3) the purpose for collecting or, if applicable, selling or sharing, the personal information; (4) the categories of third parties with whom we disclose personal information; and (5) the specific pieces of personal information we have collected about you. California residents also have the right to request: (1) The categories of personal information that we have sold or shared, and the categories of third parties



to whom the personal information was sold or shared, by category or categories of personal information for each third party to whom the personal information was sold or shared; and (2) the categories of personal information that we disclosed for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

To submit a request, please email us at [transparency@cubesmart.com](mailto:transparency@cubesmart.com) or call us at 833-866-1655.

In order to verify you are the person about whom we collected personal information you must log in to your account before making a request, or if you do not have an account, we will verify your identity by matching at least two pieces of personal information provided by you with personal information maintained by CubeSmart that we have determined to be reliable.

If your request involves receiving specific pieces of personal information (rather than categories of personal information), we must first verify your identity by matching at least three pieces of personal information provided by you with personal information maintained by CubeSmart that we have determined to be reliable. Then, you must provide a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

We cannot respond to your request to provide any personal information if we cannot verify your identity using the information provided.

## **b. Right to Request Deletion of Personal Information**

You have the right to request that CubeSmart delete personal information that we collected from you and retained, subject to certain exceptions.

To submit a request, please email us at [transparency@cubesmart.com](mailto:transparency@cubesmart.com) or call us at 833-866-1655. In order to process your request, you must first verify you are the person about whom we collected personal information. If your request relates to non-sensitive information, we can verify your identity by our online account login information, or if you do not have an account, by matching at least two data points provided by you with two data points already maintained by CubeSmart.

If your request involves sensitive personal information, we must first verify your identity by matching at least three pieces of personal information provided by you with personal information maintained by CubeSmart that we have determined to be reliable.

## **c. Right to Correct Inaccurate Personal Information**

You have the right to request that we correct inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

To submit a request, please email us at [transparency@cubesmart.com](mailto:transparency@cubesmart.com) or call us at 833-866-1655. In order to process your request, you must first verify you are the person about whom we collected personal information. If your request relates to non-sensitive information, we can verify your identity by our online account login information, or if you do not have an account, by matching at least two data points provided by you with two data points already maintained by CubeSmart.

If your request involves sensitive personal information, we must first verify your identity by matching at least three pieces of personal information provided by you with personal information maintained by CubeSmart that we have determined to be reliable.

## **d. Request Processing and Timing**

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. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For any disclosures we provide in response to data access and/or 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, which in most cases will involve Adobe PDF and comma delineated data files. We do not charge a fee to process or respond to your 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.

#### **e. Right to Opt-Out of the Sale or Sharing of Personal Information**

While CubeSmart does not monetize your personal information, the collection of data through certain third-party cookies for analytics and targeting advertising purposes may be considered a “sale” and is considered “sharing” under the CPRA. While we do not sell or share your personal information for monetary consideration, we do use third party cookies for analytics and targeted advertising purposes. To opt-out of having your information sold and shared with third-party website analytics and digital advertising service providers for this purpose, please submit a request to us by email at [transparency@cubesmart.com](mailto:transparency@cubesmart.com) or call us at 833-866-1655. Please note that we may continue to disclose your personal information where the disclosure is not a “sale” or “sharing” as defined by the CPRA. For example, we may continue to disclose information as required to comply with the law. We do not have actual knowledge that we sell or share personal information about children under the age of 16.

#### **f. Right to Limit the Use and Disclosure of Sensitive Personal Information for Certain Purposes**

As stated above, we do not use or disclose your sensitive personal information for any purpose other than those permitted under the CPRA.

#### **g. Right to Non-Discrimination for the Exercise of Privacy Rights**

California residents have the right to not be discriminated against for exercising their rights as described in this Notice. We will not discriminate against you for exercising your CPRA rights.

#### **h. Designating an Authorized Agent**

You may use an authorized agent to submit a request to opt-out of the sale of personal information on your behalf if you provide the authorized agent written permission to do so.

If you use an authorized agent to submit a request to exercise any other CPRA rights, he or she must provide their name, email address, phone number, and written permission from you that includes your contact information. We will contact you using the information provided and verify your identity directly with us. We cannot respond to your request to exercise your CPRA rights if we cannot verify your identity and the authorized agent’s authority to make the request on your behalf. Written permission is not required if the agent provides proof of power of attorney pursuant to Probate Code sections 4000 to 4465.

### **IV. Contact for More Information**

If you have any questions or concerns about our privacy policies and practices, please do not hesitate to contact us at [transparency@cubesmart.com](mailto:transparency@cubesmart.com).



## V. Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Site that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email [transparency@cubesmart.com](mailto:transparency@cubesmart.com) or call 833-866-1655.

## VI. Changes to Our Notice

This Notice was last updated on June 14, 2023. CubeSmart reserves the right to amend this Notice at its discretion and at any time. When we make changes to this Notice, we will post the updated notice on our website and update the Notice's effective date.