

The RMR Group

Last Updated: May 12, 2025

General

This Privacy Notice is to inform you of our policies and practices regarding information we collect about you.

This Privacy Notice governs the collection of information at the websites located at the URLs www.rmrgroup.com, www.svcreit.com, www.dhcreit.com, www.opireit.com, www.ilptreit.com, www.sevnreit.com, www.ariumliving.com, residential.rmrgroup.com and other individual property websites and associated websites where this Privacy Notice is posted (collectively our “Sites”), as well as information that we may collect both online and offline by other means, as described below. Employees, contractors and job applicants who are California residents receive a supplemental privacy notice that applies to their relationship with The RMR Group LLC (“RMR”) in the context of their employment or job application. In the event of any conflict with this Privacy Notice, the terms of the supplemental privacy notice will control.

Any submission to and/or communication with us is subject to our Terms and Conditions, and your submission constitutes your acceptance of our Terms and Conditions. Our Terms and Conditions are available on our Sites.

We will review and revise our policies from time to time as appropriate as our business evolves. If we change this Privacy Notice, we will post an updated version of the Privacy Notice on our Sites. It is your responsibility to periodically check this Privacy Notice so that you are aware of what information we collect, how we use it and under what circumstances we might disclose it. Your continued use of our Sites following the posting of changes constitutes your acceptance of those changes.

If you have additional questions about this Privacy Notice, please contact us using the contact information below in the section “Contacting Us.”

How We Collect and Use Personal Information

We collect and use Personal Information in a number of ways. We collect Personal Information when you interact with us on our Sites or on social media, when you contact us by email, telephone or by other means, including when you correspond with our investor relations group, when you visit one of our managed properties, invest with us or our clients, borrow from us or our clients, or guarantee a commercial lease or loan.

Within the context of this Privacy Notice, “Personal Information” means information that may enable the identification, directly or indirectly, of a specific person or household, or that is linked to such potentially identifying information. While the below makes reference to California law, the information provided also applies outside of California. We collect Personal Information in the following ways and from the following sources:

Personal Information You Provide Us on Our Sites or Social Media. When you interact with our Sites or on social media, we may collect information you provide us, such as when you complete one of our online forms, such as an inquiry or an Email Alert form, or submit comments on social media. This information may include:

Identifiers, such as your name, alias, email address, physical address, telephone number, fax number, and account name;

Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, address, telephone number, education, employment, and employment history;

Commercial information, such as information from shareholders about their holdings;

Professional or employment-related information provided when you complete a job application online or otherwise communicate with us; and

Education information provided when you complete a job application online or otherwise communicate with us.

2. Information which is Collected Automatically When You Visit Our Sites. When you visit our Sites, we automatically collect Internet or other similar network activity such as information regarding your interaction with our website or applications you complete along with identifiers such as an IP address, and geolocation information to the extent indicated through your IP address. This information may include:

a. **Usage Information.** We collect information about how you interact with our Sites. This includes information such as the dates and time that you visit our Sites, the pages you view, links clicked, referring / exit URLs, your browser type, nonsensitive text entered, and the number of clicks on our Sites. In some cases, we collect this information through cookies, web beacons, and similar technologies. To learn more about these technologies, please see the Cookies and Other Technologies section below;

b. **Device Information.** We collect information about the devices (e.g., computer, tablet, and mobile phone) you use to access our Sites, including your device model, IP address, operating system, the temporary or persistent unique device identifiers (sometimes called UDID), and mobile network operator information. Information such as an IP address can in

some circumstances identify your general location and as such may constitute geolocation information pursuant to the California Consumer Privacy Act; and

c. Internet Service Provider (“ISP”) Information. We collect information about your domain name, which is the name of the ISP computer through which you access the Internet.

3. Information You Provide When You Contact Us: When you contact us by email, telephone, letter, in person (e.g., at one of the properties that we manage) or by other means, you may supply us with Personal Information. This may include:

a. Identifiers, such as your name, alias email address, postal address, telephone and fax number, account name, social security number, driver’s license number, passport number, or other similar identifiers;

b. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as signature, social security number, physical characteristics or description, 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;

c. Commercial information, such as information from shareholders about their holdings;

d. Professional or employment-related information; and

e. Education information.

4. Information You Provide When You Guarantee a Commercial Lease or Loan: When you provide information to guarantee a commercial lease or a loan in an individual capacity, you may supply us with Personal Information. This may include:

i. Identifiers, such as your name, alias, email address, physical address, telephone and fax number, social security number, driver’s license number, passport number, or other similar identifiers;

ii. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as signature, social security number, address, telephone number, passport number, driver’s license or state identification card number, employment, employment history, bank account number, credit card number, debit card number, or any other financial information; and

iii. Professional or employment-related information.

5. Personal Information You Provide In Connection With a Residential Lease: When you provide information to apply for and become a resident of a residential community we manage, you may supply us with Personal Information. This may include:

- i. Identifiers, such as your name, alias, email address, physical address, telephone and fax number, social security number, driver's license number, passport number, or other similar identifiers;
- ii. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as signature, social security number, address, telephone number, passport number, driver's license or state identification card number, employment, employment history, bank account number, credit card number, debit card number, or any other financial information;
- iii. Characteristics of protected classifications, such as age (40 years or older), citizenship, marital status, physical or mental disability, or other characteristics; and
- iv. Professional or employment-related information

6. Personal Information We Receive When You Visit One of Our Managed Properties: When you visit one of the properties that we manage ("Managed Properties"), we may receive Personal Information about you. This may include:

- i. Identifiers, such as your name, for example, when you sign in at the front desk; and
- ii. Visual information that we collect via security cameras deployed at the Managed Properties.

7. Personal Information We Receive from Our Affiliates When you provide information to one of our affiliates or referral services, you may supply the affiliate with Personal Information that the affiliate may share with us. This includes information provided by prospective tenants to brokers before touring one of the Managed Properties. This may include:

- i. Identifiers, such as your name, alias, email address, postal address, telephone and fax number; and
- ii. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, address, and telephone number.

How Your Personal Information Is Collected, Used, and Disclosed for Business or Commercial Purposes

We collect and use Personal Information to provide our services to you, fulfill contracts, comply with laws and for our other business interests. We collect, use, and disclose your Personal Information including for the following business purposes:

- (a) To improve our Sites, our social media, and services, and your experience with our Sites, our social media and services;
- (b) To further develop, customize and improve our Sites, our social media accounts, and your user experience, based on personal or general experiences;
- (c) For our everyday business purposes – such as to communicate with you, manage records, respond to court orders and legal investigations, and administer and provide services to you;
- (d) To manage our business and commercial relationships, including for purposes of entering into and performing under contracts, leases, and related documentation;
- (e) To market our services, including through investor and marketing email lists;
- (f) As necessary or appropriate to protect the rights, property or safety of us, our clients or others;
- (g) To help maintain the safety, security, and integrity of our Sites, products and services, databases and other technology assets, and business;
- (h) To contact and communicate with you (via email, or any other available channels) to respond to questions or inquiries delivered to us, including when you communicate with our investor relations or other groups;
- (i) To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity;
- (j) To facilitate decisions made by RMR's or our clients' management or RMR's Board of Directors about the policies for sharing Personal Information among RMR, its affiliates, and clients;
- (k) To manage properties, including the servicing of leases;
- (l) To process requests, purchases, transactions, and payments and prevent transactional fraud; and
- (m) To comply with any applicable laws and/or regulations (such as to comply with valid legal processes such as a search warrant, subpoena, or court order).

Disclosure of Your Personal Information to Third Parties

We may disclose your Personal Information to third parties, including service providers, for commercial or business purposes, such as (i) when you request or authorize it; (ii) when information is provided to help complete a transaction for you; (iii) if we conclude that we are required by law or have a good faith belief that access, preservation, or disclosure of such information is reasonably necessary to protect the rights, property, or safety of RMR, its clients, their respective customers, or the public; or (iv) in connection with a corporate reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or capital, including in connection with any bankruptcy or similar proceedings.

We may engage selected third-party companies and individuals to perform services on our behalf or that of our clients, including but not limited to processing, storing, tracking, and organizing information on our behalf, hosting services, data analytics services, email distribution and monitoring services, and our business, legal, and financial and compliance advisors (collectively, “Service Providers”). We may also disclose your information to our Service Providers for the purposes described in this Privacy Notice (e.g., analyzing data, providing marketing assistance, providing customer service, processing orders, etc.). These Service Providers may have access to your Personal Information depending on each of their specific roles and purposes in facilitating the purposes of our services, and may only use it for such purposes.

Among others, we currently engage the following Service Providers, whose services are described in further detail below:

- (a) IDX: Web Hosting Services (“IDX WebHost”)
- (b) Google, Inc.: Analytics (“Google Analytics”)
- (c) Ticker Technologies: Stock Quote / Chart Data

We may disclose your Personal Information in additional ways, pursuant to your explicit approval, if we are legally obligated to do so, or if we have successfully rendered such data non-personal and anonymous. However, we will not sell your Personal Information to any third party without your consent.

The categories of Personal Information we may disclose are the following, as described more fully under “How We Collect and Use Personal Information” above: Identifiers, Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), commercial information, internet or other electronic network activity

information, geolocation information (to the extent associated with IP address), visual information, professional or employment-related information, and education information.

Retaining and Storage of Personal Information

In general, we retain your Personal Information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In some cases, we retain information indefinitely, unless we receive a request (which we can confirm) to delete such information. We may retain your Personal Information despite such request, pursuant to and to fulfill our legitimate interest for legal and accounting purposes (i.e., as required by laws applicable to our record and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise).

Children

We do not solicit or knowingly collect Personal Information from children under the age of 16 and we do not knowingly sell or share such information. If we nevertheless receive Personal Information from an individual who indicates that he, she or they is, or whom we otherwise have reason to believe is, under the age of 16, we will delete such information from our systems.

If you have knowledge that a child under the age of 16 has submitted Personal Information to us or if parents or guardians want to review, change or delete their child's registration information, simply contact us via one of the methods indicated at the end of this Privacy Notice. Parents can also telephone us at the number below. Parents will be required to provide verification in order to access or change information.

Specific Provisions Regarding Email Alert Services

All information that you provide to us on our Sites is collected and stored automatically at the time that you provide your information. If you would like to delete your email address from our Email Alert list, please unsubscribe from the Email Alert list using our automated system. From time to time, we may also request a verification of your email address in order to update the Email Alerts distribution lists we maintain. We may delete email addresses from the Email Alert distribution list when email addresses cannot be verified. An email address that cannot be verified will be removed from the Email Alert list.

If you have joined our Email Alert service, we may send you, by email, press releases or SEC filings or notifications of press releases or SEC filings that have been posted to our Sites. If you do not wish to receive these communications from us, please unsubscribe using our automated system on our Sites.

Cookies and Other Technologies

We and our Service Providers may use cookies and other tracking technologies (“Tracking Technologies”) on our Sites to collect and store certain information about usage in order to personalize our Sites, improve our Sites, improve our services, and help us remember you and your preferences when you revisit our Sites.

A cookie is a text file that our Sites transfer to your computer's hard drive for recordkeeping purposes and to enhance the quality of your visit to our Sites. The cookie assigns a random, unique number to your computer. Our cookie may record “clickstream” information (data reporting the URLs or names of the pages on our Sites that you have visited) and other useful information about your interaction with our Sites. For additional information regarding cookies and the way to control them, please check out the help file of your browser or visit <http://www.aboutcookies.org>.

If you wish to control cookies, you can review your Internet browser settings, typically under the sections “Help” or “Internet Options,” to exercise choices you have for certain cookies. If you disable or delete certain cookies in your settings, you may not be able to use features of our Sites.

We log IP addresses and domain names and aggregate them for system administration and to monitor the use of our Sites. We use the aggregated information, for example, to measure the number of visits to our Sites, the average time spent on our Sites, the number of pages viewed and to monitor various other statistics about our Sites. We also collect information that you provide by filling out one of our online forms.

We use a tool called Google Analytics to collect information about your use of our Sites, such as how often you visit our Sites, what pages you visit when you do so, and what sites you used before coming to our Sites. Google Analytics may use cookies and similar technologies to collect and store such information. When analyzed, this data helps us understand how visitors arrive at our Sites, what type of content is most popular, what type of visitors in the aggregate are interested in particular kinds of content, and the like. We may permit our Service Providers to access this data for our purposes and our benefit. Google provides users choice on how their data is collected by Google Analytics by developing an Opt-out Browser Add-on, which can be located at:

<http://tools.google.com/dlpage/gaoptout?hl=en>. Upon installing this Add-on, no information is sent to Google. For more information on how Google Analytics collects and uses data please see “How Google uses data when you use our partners’ sites or apps” (located at www.google.com/policies/privacy/partners/) or any other URL Google may provide from time to time.

We use a service called IDX WebHost to host our Sites and to provide authentication and security. We also use Ticker Tech to provide services about investment information.

The opt-outs described above are device and browser-specific and may not work on all devices. If you choose to opt-out through any of these opt-out tools, this does not mean you will cease to see advertising. Rather, the ads you see will just not be based on your interests.

Notice Concerning Do Not Track

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We are committed to providing you with choices about information collected on our Sites for third party purposes, and that is why we provide the variety of opt-out mechanisms listed above. However, we do not currently recognize or respond to browser-initiated DNT signals. To learn more about Do

Not Track, you can visit <https://allaboutdnt.com>.

Automated Decisions

We will not use Personal Information to formulate a decision based solely on automated processing which produces legal effects or which similarly significantly impacts the person.

Links

Our Sites may contain links to other websites. We are not responsible for the privacy practices of any linked website (whether accessed through an advertisement, service or content link) and you should review such practices prior to submitting any information to linked websites.

How Your Information Is Protected

We have implemented measures to help protect Personal Information from loss, misuse or unauthorized access or disclosure. While we strive to protect Personal Information, we cannot guarantee its security.

Your Rights Regarding Your Personal Information

Individuals in Andorra, Argentina, Australia, California, Canada, Europe, Faroe Islands, Guernsey, Hong Kong, Israel, Isle of Man, Japan, Jersey, Mexico, New Zealand, Singapore, South Korea, Switzerland, the United Kingdom, Uruguay, and certain other jurisdictions may have certain granted data subject rights. These rights vary, but they may include the right to: (i) request access to and rectification or erasure of their Personal Information; (ii) restrict or object to the processing of their Personal Information including to limit our use of sensitive personal information, where applicable; and (iii) obtain a copy of their Personal Information in a portable format. Individuals may also have the right to lodge a complaint about the processing of Personal Information with a data protection authority. We do not sell your information, so you are already opted-out of such sales. We will not discriminate against you for exercising any of these rights.

How to Exercise Data Subject Rights

If you wish to exercise any of data subject rights please email ir@rmrgroup.com with the phrase “Data Subject Rights” in the subject line. You may also call us toll-free at +1-866-511-5038. We will review your requests and respond appropriately. The rights described herein are not absolute and we reserve all rights available to us at law in this regard. Additionally, if we retain your Personal Information only in de-identified form, we will not attempt to re-identify your data in response to a Data Subject Rights request.

If you make a request related your Personal Information, we will need to verify your identity. To do so, we will request that you match specific pieces of information you have provided us previously, as well as, in some instances, provide a signed declaration under penalty of perjury that you are the consumer whose Personal Information is the subject of the request. If it is necessary to collect additional information from you, we will use the information only for verification purposes and will delete it as soon as practicable after complying the request. For requests related to particularly sensitive information, we may require additional proof of identification. If you make a Data Subject Rights request through

an authorized agent, we will require written proof that the agent is authorized to act on your behalf. We will process your request within the time provided by applicable law.

Cross-Border Data Transfers

The Sites are controlled, operated and administered by The RMR Group from our offices within the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Any information you provide to us through use of our Sites may be stored and processed, transferred between and accessed from the United States and other countries that may not guarantee the same level of protection of personal information as the one in which you reside. However, we will handle your personal information in accordance with this Privacy Notice regardless of where your personal information is stored or accessed.

Additional Information for California Residents

If you are a California resident, then this section of our Privacy Policy may apply to you. This section is intended to describe our practices under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (together, the “CCPA”) and applies to personal information of California residents.

Categories of Personal Information Collected

California law requires us to provide additional information about the personal information we collect with reference to specific categories of information. For additional information about our sources of personal information, how we use personal information, and how we disclose personal information, refer to the RMR Privacy Notice. We do not sell the personal information of California residents as defined by the CCPA or share such personal information for purposes of cross contextual behavioral advertising.

Within the last twelve months, we have collected the following categories of personal information from California residents:

Category of Personal Information	Purpose for Collection and Use	Is personal information sold or shared?	How long is personal information retained?
A. Identifiers: a real name, alias, email address, postal/physical address, telephone number, fax number, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers	To provide the content and functionality of our Sites, social media accounts, and other services; To further develop, customize and improve our Sites, social media accounts, other services, and your user experience; To contact and communicate with you, including for marketing purposes; To support and enhance our data security.	No	As long as necessary to fulfill purposes collected for, including any legal, accounting or reporting requirements.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)): a name, address, telephone number, education, employment, employment history	To provide the content and functionality of our Sites, social media accounts, and other services; To contact and communicate with you, including for marketing purposes; To support and enhance our data security; To otherwise operate our business.	No	As long as necessary to fulfill purposes collected for, including any legal, accounting or reporting requirements.
D. Internet or other similar network activity: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement (e.g., visitor domain name, IP address, web browser, operating system, internet service provider, the pages visited, clickstream data, and time and date of visit)	To provide the content and functionality of our Sites, social media accounts, and other services; To further develop, customize and improve our Sites, social media accounts, other services, and your user experience; To support and enhance our data security; To otherwise operate our business.	No	As long as necessary to fulfill purposes collected for, including any legal, accounting or reporting requirements.
E. Commercial Information, such as information from shareholders about their holdings	To contact and communicate with you as a shareholder; To otherwise operate our business.	No.	As long as necessary to fulfill purposes collected for, including any legal, accounting or reporting requirements.
F. Geolocation data: Geographic location information about a particular individual or device, specifically IP address	IP address, which we collect, can reveal information about your location. We collect such information to: To provide the content and functionality of our Sites; To further develop, customize and improve our Sites; To support and enhance our data security; To otherwise operate our business	No	As long as necessary to fulfill purposes collected for, including any legal, accounting or reporting requirements.
G. Sensory Data: Audio, electronic, visual or similar information	To manage properties; To protect the rights, property, or safety of us, our clients, or others;	No	As long as necessary to fulfill purposes collected for, including any legal, accounting or reporting requirements.

Category of Personal Information	Purpose for Collection and Use	Is personal information sold or shared?	How long is personal information retained?
	To otherwise operate our business		
H. Professional or employment-related information: Employer and job title	To provide the content and functionality of our Sites, social media accounts, and other services, specifically with respect to job applications and other employment related services; To contact and communicate with you including for marketing purposes; To support and enhance our data security; To otherwise operate our business.	No.	As long as necessary to fulfill purposes collected for, including any legal, accounting or reporting requirements.
I. Education Information	To provide the content and functionality of our Sites, social media accounts, and other services, specifically with respect to job applications and other employment related services; To contact and communicate with you including for marketing purposes; To support and enhance our data security; To otherwise operate our business.	No.	As long as necessary to fulfill purposes collected for, including any legal, accounting or reporting requirements.

Sensitive Personal Information

We may collect information that is considered “sensitive” under the CCPA, such as your account login information and social security number. When we do so, we use such information only for lawful purposes in compliance with the CCPA, such as to perform the services or provide the goods requested by you and to resist malicious, deceptive, fraudulent, or illegal actions. We do not use that information to infer characteristics about individuals.

Data Subject Rights

Subject to certain limitations and exemptions, California residents may have certain privacy rights, including the rights to:

Know what personal information RMR collects, including (a) the right to request information regarding the categories of personal information that we collect along with other information such as the categories of sources from which the information is collected and third parties with whom it is shared and (b) the right to request a copy of the specific pieces of personal information that we collect (sometimes referred to as the right to access personal information);

Correct or delete personal information; Opt out of the sale of personal information or sharing of personal information for cross-context behavioral advertising—we do not sell personal information or share personal information for purposes of cross-context behavioral advertising, and so you are already opted out of such practices; and

To limit the use or disclosure of sensitive personal data under certain circumstances.

We will not discriminate against you for exercising any of these rights. The rights described herein are not absolute and we reserve all of our rights available to us at law in this regard. If you wish to exercise any of these rights, refer to the section above titled “How to Exercise Data Subject Requests.”

California Shine the Light Law

California residents have the right to request information about how we share certain categories of personal information with third parties. California law gives you the right to send us a request at a designated address to receive the following information:

Categories of information we disclose to third parties for their direct marketing purposes during the preceding calendar year; and

Names and addresses of the third parties that received that information; and, if the nature of the third party's business cannot be determined from their name, examples of the products or services marketed.

Contacting Us

If you have any questions about this Privacy Notice or wish to exercise certain rights for which you are eligible with respect to your Personal Information, please contact us using the information below. Kindly state the nature of your inquiry at the subject line of the email.

The RMR Group

Two Newton Place

255 Washington Street

Newton, MA 02458

United States of America

Attn: Investor Relations

By email: ir@rmrgroup.com

Service Properties Trust

Two Newton Place

255 Washington Street

Newton, MA 02458

United States of America

Attn: Investor Relations

By email: ir@svcreit.com