

PRIVACY POLICY FOR 1836 REALTY, LLC AND 1836 PROPERTY MANAGEMENT

Our Commitment

At 1836 Realty, LLC and 1836 Property Management, we are committed to protecting all personal information that we collect in the course of conducting business.

What is personal information?

Personal information is:

- (1) information in a consumer report; or
- (2) an individual's first name or initial and last name in combination with any of the following:
 - (a) birth date;
 - (b) social security number or other government issued identification number;
 - (c) mother's maiden name;
 - (d) unique biometric data (fingerprint, voice print, retina image);
 - (e) unique electronic identification number our routing code;
 - (f) telecommunication access devices including debit or credit card information; or
 - (g) financial institution account or information.

A consumer report is a report related to a person's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living prepared by or obtained from an agency that collects such information such as a credit reporting agency.

How is personal information collected?

This company obtains personal information in the following ways:

- (1) in consumer reports from reporting agencies to which this company subscribes in connection with lease applications, loan applications, or for other reasons that the consumer may authorize this company to obtain;
- (2) in lease applications a prospective tenant completes;
- (3) in loan applications a borrower or buyer completes;
- (4) in other real estate related forms the customer or client completes in or related to a transaction; and
- (5) in tax reporting forms that the customer or client is required to complete and which are given to this company.

Why We Collect Your Information

We will collect your personal information for any of the following purposes:

- To identify and communicate with our customers
- To establish eligibility for tenancy
- To assess creditworthiness
- To process payments

- To ensure the orderly management of the rental properties entrusted to our care

How and when is the personal information used

Personal Information from Prospective Tenants: The personal information that prospective tenants provide to this company is primarily used to obtain consumer reports (credit checks). It may also be used to perform background checks and rental history searches. The information in the consumer reports may be discussed with landlords for whom this company manages property. This company also reports information to credit reporting agencies and uses personal information to complete those reports.

Personal Information from Owners of Properties Managed by the Company: When this company acts as a property manager for a property owner, the company uses the property owner's personal information only: (a) to deliver the required management services; (b) to file any required reports with governmental agencies (for example, the IRS); or (c) for other purposes the property owner may authorize.

Personal Information from Clients: When this company represents a person (buyer, seller, landlord, or tenant) in a transaction the agent servicing the client may, on the client's behalf and at the client's instruction, convey personal information he or she provides to the agent to service providers (for example, mortgage lenders and title companies) as those service providers may require for the products or services the client needs or requests. If this company represents a prospective tenant in a lease transaction, the personal information may, on the tenant's behalf and with the tenant's knowledge, be discussed with and provided to landlords or their agents. This company and its agents exercise reasonable discretion when discussing any personal information with others.

We Will Obtain Your Permission

Except where authorized or required by law, we will not collect, use or disclose your personal information. We will only request the information that we need for the purposes that we have identified to you.

How We Protect Your Information

We are committed to our responsibility to ensure that your personal information remains secure. Access to your personal information will be limited to select employees within our organization. Where information must be provided to others, that information will be limited to only that which is specifically required for a particular task. We will do our best to ensure that your information is accurate and up to date. It is very important that you contact us when any changes to your personal information occur.

Written files in this company are protected under lock and key.

Electronic records are protected under an access name and password assigned to persons in this company.

This company and its agents exercise reasonable discretion when discussing any personal information with others and releases personal information to others only as described by this policy.

This company does not permit its employees or agents to make copies of consumer reports or records of insurance claims. The consumer reports retained in the company's files are not to be accessed in the future as a convenience to customers or clients.

The individual agents that work with this company are independent contractors and the agent with whom a customer or client works with may maintain a separate transaction file. The company instructs its agents to not permit other persons to access the personal information in files the agents maintain. The company instructs its agents to protect the personal information in the agents' files in the same manner as described in this policy.

Who has access to the personal information?

The following persons have access to personal information in this company's files:

- (1) the agent or broker who is servicing or coordinating the transaction;
- (2) the office manager to whom the agent reports; and
- (3) the owner of the company.

Property owners for whom the company manages properties do not have access to personal information in the company's files. However, the company and its agents may discuss the information in a tenant's consumer report or lease application with a property owner. Copies of such information are provided to the landlord only: (1) with the tenant's consent; or (2) if the company ceases to be the property manager and the landlord requests that the files be sent to the landlord, the landlord's attorney, or the new property manager.

Personal information from a buyer, seller, landlord, or tenant may be discussed with others (such as mortgage lenders or prospective landlords) only as is reasonably necessary to negotiate or close the transaction or to provide the services the customer or client seeks from this company.

This company may, at the customer's or client's request, provide personal information to service providers in a transaction such as a title company or mortgage company if it is necessary to expedite or complete a transaction.

If the company is required by law to allow others to access the personal information in the company's files, the company will comply with the law (for example, compliance with court orders, subpoenas, or governmental investigations). The company will also allow law enforcement agencies access to personal information in order to cooperate with such investigations.

Right of Access to Your Personal Information

You also have the right to know:

- The methods by which we collected the information
- The purposes for which we are using the information, and
- To whom the information has been disclosed

Any request that you make should be sufficiently detailed so that we may properly respond to your request. When you make a request, we will insist upon verification of your identity, either by photograph or signature.

When providing your personal information, we will edit certain information as required or authorized by law, including the personal information of other individuals, information that may be subject to investigation, as well as any confidential information.

If you believe that any of the information that we have collected about you is inaccurate or incomplete you have the right to ask us to change it.

How is the personal information disposed?

This company uses reasonable measures to dispose of personal information. Personal information is usually disposed of by shredding or burning documents, erasing electronic files by means that make the files unreadable or undecipherable, or by eradicating personal information from documents or electronic files in ways that make the personal information unreadable.

Erroneous Records

If this company erroneously reports information to a consumer reporting agency, the company will act to correct the information in the company's records and request the reporting agency to correct the information in its records promptly after the company has learned and determined that the report was in error.

If this company maintains an erroneous record that a consumer has issued a dishonored check, the company will promptly delete the record after the company and consumer agree that the information is in error or after the consumer provides the company with a law enforcement agency report stating that the dishonored check was not authorized.