# **Privacy Policy for 3G Properties**

#### 1. 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) birthdate;
  - (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 or 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.

## 2. How is personal information collected?

3G Properties obtains personal information in the following ways:

- (1) in consumer reports from reporting agencies to which 3G Properties subscribes in connection with lease applications, loan applications, or for other reasons that the consumer may authorize 3G Properties to obtain;
- (2) in lease applications a prospective tenant completes;
- (3) in copies of government-issued identification that accompany lease applications and property management agreements;
- (4) in loan applications a borrower or buyer completes;
- (5) in other real estate related forms the customer or client completes in or related to a transaction; and
- (6) in tax reporting forms that the customer or client is required to complete and which are given to 3G Properties.

When completing the forms required above, the customer or client may send the information to 3G Properties by mail, fax, personal delivery, through the company website, or by email. Customers or

clients may occasionally provide personal information to 3G Properties or its agents by other means such as telephone calls, fax messages, or email messages in order to expedite a transaction in which the customer or client is involved.

#### 3. How and when is the personal information used?

<u>Personal Information from Prospective Tenants</u>: The personal information that prospective tenants provide to 3G Properties 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 3G Properties manages property. 3G Properties also reports information to credit reporting agencies and uses personal information to complete those reports.

<u>Personal Information from Owners of Properties managed by 3G Properties</u>: When 3G Properties acts as a property manager for a property owner, 3G Properties uses the property owner's personal information only:

- (1) to deliver the required management services;
- (2) to file any required reports with governmental agencies (for example, the IRS); or
- (3) for other purposes the property owner may authorize.

### 4. How is the personal information protected?

Written files in 3G Properties are protected under lock and key.

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

3G Properties 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.

3G Properties 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.

## 5. 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 property manager assigned to the specific property;
- (3) the office manager to whom the agent or property manager reports; and
- (4) the owner of 3G Properties.

Property owners for whom 3G Properties manages investment properties do not have access to personal information in the company's files. However, 3G Properties 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 3G Properties 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 3G Properties.

3G Properties 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 the transaction.

If 3G Properties is required by law to allow others to access the personal information in the company's files, 3G Properties will comply with the law (for example, compliance with court orders, subpoenas, or governmental investigations). 3G Properties will also allow law enforcement agencies access to personal information in order to cooperate with such investigations.

#### 6. How is the personal information disposed?

3G Properties uses reasonable measures to dispose of personal information. Personal information is usually disposed of by shredding, 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.

## 7. Erroneous Records:

If 3G Properties erroneously reports information to a consumer reporting agency, 3G Properties 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 3G Properties has learned and determined that the report was in error.

If 3G Properties 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 3G Properties with a law enforcement agency report stating that the dishonored check was not authorized.

NOTICE: 3G Properties asks any person who provides personal information to 3G Properties or one of its agents to identify the information at that time as "personal information".