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## Privacy Policy

Federal and state law requires businesses to implement proper procedures for the disposal of personal information the business maintains in its records. The law requires the business to take reasonable measures to protect against unauthorized access. Reasonable measures include shredding, erasing, pulverizing, and other types of destruction. Mere deletion of electronic records is not sufficient. The destruction of electronic records must render the electronic records "unreadable or undecipherable."

A business is also required to delete any electronic record that was established when the customer issued a bad check which is later found to be in error. The law applies to any business that accepts checks.

**DEFINITIONS:** Personal information is:

- a) information in a consumer report; or
- b) an individual's first name or initial and last name in combination with any of the following:
  - i. birth date;
  - ii. social security number or other government issued identification number;
  - iii. mother's maiden name;
  - iv. unique biometric data (fingerprint, voice print, retina image);
  - v. unique electronic identification number our routing code;
  - vi. telecommunication access devices including debit or credit card information; or
  - vii. 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 PERSONAL INFORMATION IS COLLECTED:** Skylight Realty Group, LLC (the "Firm") obtains personal information in the following ways:

- a) in consumer reports from reporting agencies to which the Company subscribes in
- b) connection with lease applications, loan applications, or for other reasons that the
- c) consumer may authorize the Company to obtain;
- d) in lease applications a prospective tenant completes;
- e) in loan applications a borrower or buyer completes;
- f) in other real estate related forms the customer or client completes in or related to a
- g) transaction; and
- h) in tax reporting forms that the customer or client is required to complete and which are given to the Company.

When completing the forms required above, the customer or client may send the information to this Company by mail, fax, personal delivery, or by email. Customers or clients may occasionally provide personal information to this Company or its Agents by other means such as telephone calls, fax messages, or email messages in order expedite a transaction in which the customer or client is involved.

**HOW AND WHEN PERSONAL INFORMATION IS USED:**

- a) Personal Information from Prospective Tenants: The personal information that prospective tenants provide to Skylight Realty Group, LLC 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 Skylight Realty Group, LLC manages property. Skylight Realty Group, LLC also reports information to credit reporting agencies and uses personal information to complete those reports.
- b) Personal Information from Owners of Properties Managed by the Company: When Skylight Realty Group, LLC 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.
- c) Personal Information from Clients: When Skylight Realty Group, LLC 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 Skylight Realty Group, LLC 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. Skylight Realty Group, LLC and its agents exercise reasonable discretion when discussing any personal information with others.

**HOW PERSONAL INFORMATION IS PROTECTED:** Written files in Skylight Realty Group, LLC are protected under lock and key. Electronic records are protected under an access name and password assigned to persons in the Company. Skylight Realty Group, LLC 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. Skylight Realty Group, LLC 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.

It is explicitly prohibited for any Associate or Employee to have on file any banking information such as account numbers and routing numbers. Banking information must never be copied for the purpose of negotiating an offer and it must never be sent via an email as an attachment nor in the body of an email.

The individual agents that work with Skylight Realty Group, LLC 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 PERSONAL INFORMATION:** The following persons have access to personal information in Skylight Realty Group, LLC's files:

- a) the Agent or Broker who is servicing or coordinating the transaction;
- b) Management to whom the Agent reports; and
- c) 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 the Company.

Skylight Realty Group, LLC 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.

**HOW PERSONAL INFORMATION IS DISPOSED:** Skylight Realty Group, LLC 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 Skylight Realty Group, LLC 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 Skylight Realty Group, LLC 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.

**WEBSITE COOKIES:** In order for some of the technologies used in the Company to work properly, a small data file ("cookie") must be downloaded and stored on the device used to access the Company's website. By default, most web browsers automatically accept cookies and the Company's cookies are used mostly for stability, security, functionality, performance and advertising purposes. Any website user may block, opt-out of or otherwise manage such cookie technology through their browser settings or other sources, but it should be noted that this may adversely affect the way the website user's experience the Company's website.

**Notice: Skylight Realty Group, LLC asks any person who provides personal information to the Company or one of its agents to identify the information at that time as "personal information."**