

## **MBM Property Management LLC Privacy Policy on Personal Information**

MBM Property Management LLC (MBM) understands the value of protecting each applicant's personal information. MBM and its landlords follow all federal and state laws regarding the protection of personal information.

**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?** MBM 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 documents that the customer or client provides that are related to a transaction; and
- (5) in tax reporting forms that the customer, client or vendor is required to complete and which are given to this company.

When completing the forms required above, the customer or client may send the information to this company via its online application, postal mail, fax, personal delivery, or by e-mail. Customers or clients may occasionally provide personal information to this company or its agents by other means such as telephone calls, fax messages, or e-mail messages in order expedite a transaction in which the customer or client is involved.

**How and when is 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 credit reports will not be discussed with any third party.** This company reports information to credit reporting agencies and uses personal information to complete those reports. The private information collected may be used as part of an effort to collect a debt if the tenant has a balance due to the landlord or property manager.

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 (including collecting a debt).

Personal Information from Vendors of the Company: The personal information that vendors and prospective vendors provide to this company is used to:

- (a) file any required reports with governmental agencies (for example, the IRS); and/or

## **MBM Property Management LLC Privacy Policy on Personal Information**

- (b) conduct a background check and obtain consumer reports (credit checks) on the principals of any respective vendor; and/or
- (c) share with any attorney, insurance company, court, or other third-party if necessary and related to work performed by the vendor.

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. This information may also be utilized in reviewing any lease renewal or in obtaining payment(s) owed in the future.

**How is personal information protected, and who has access?** Written files in this company are protected under lock and key, and are generally temporary in nature. All records are converted in to electronic records, at which time the original paper documents are shredded.

Electronic records are protected under an access name and password assigned to persons in this company, landlords, tenants and vendors. Electronic records are maintained on individual company computers, as well as third-party service providers (management software, cloud storage) that have their own unique privacy policies (can be made available upon request).

MBM 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. MBM does not permit its employees or agents to make copies of consumer reports or other private information. 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 the private files the agents maintain. The company instructs its agents to protect the private information in the agents' files in the same manner as described in this policy.

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

## **MBM Property Management LLC Privacy Policy on Personal Information**

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 is the information disposed of?** Once the applicant's personal information is no longer needed, the personal information will either be electronically stored on a secure, password-protected website or on a password-protected disk or physically destroyed/deleted in a manner that ensures that no unauthorized person will be able to gain access to the confidential information from the corresponding files.

**Erroneous Records:** If MBM erroneously reports information to a consumer reporting agency, MBM 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 MBM 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.

**What happens to personal information collected by a lease locator or another real estate agent?** If an applicant supplies personal information to a locator service or other real estate agent other than the landlord/landlord's agent, the applicant should be aware that the other agents or lease locators are independent contractors and not obligated to follow MBM's Privacy Policy on Personal Information. Applicants should require any locator service, other real estate agent or third-party participant that obtains applicant's personal information to furnish their own Privacy Policy on Personal Information.

**Notice: MBM asks any person who provides personal information to this company or one of its agents to identify the information at that time as "personal information."**

Regards,

MBM Property Management LLC