

## **Online Privacy Policy**

*Effective as of February 18, 2020*

Your privacy is important to the Public and Affordable Housing Research Corporation (PAHRC) and the National Low Income Housing Coalition (NLIHC), the creators of the National Housing Preservation Database (“NHPD”). We are implementing this Privacy Policy as we are committed to protecting your privacy and want to be transparent about the way we collect, use, maintain, disclose, and secure your information. While the NHPD is a product of NLIHC and PAHRC, PAHRC administers the NHPD website. The only occasions PAHRC would share a name of a registrant with NLIHC (not address, email or other information) would be to consult on whether an entity is qualified to use the database. NLIHC does not store, use, or share the names. The policy described below applies in all cases.

This Privacy Policy applies to all information collected by PAHRC from various sources, including, but not limited to, the NHPD website, social media, online forms, and electronic newsletters or communications. Please review this Privacy Policy carefully in order to gain a better understanding of PAHRC’s procedures in relation to your data and how that data will be collected, used or managed.

### **Changes to this Privacy Policy**

PAHRC reserves the right to make changes to this Privacy Policy from time to time based on changes to applicable laws and regulations, technology, our business, or other requirements applicable to us. We suggest that you periodically check for Privacy Policy updates as revisions will be posted on our website and your continued use of this website constitutes your agreement to be bound by any such changes to this policy. If you do not agree with this Privacy Policy, you are not authorized to use this website.

### **What Information Do We Collect?**

Specific information collected, and the type of data PAHRC may process about you, will depend on your relationship with us and how you interact with the organization. Typically, there are two types of information that may be collected when you visit the NHPD website or use any of the previously mentioned sources. These two information types are non-personal information and personal information.

*Non-Personal Information*

*Personal Information*

<p><b>Data that does not directly identify you and is automatically collected via data collection technologies.</b></p>	<p><b>Data that is unique to you and directly identifies you. This is only collected when you provide the information to us via an online form, as a user, in connection with other activities, services, or features, such as signing up for a newsletter.</b></p>
<p><i>The types of non-personal information that may be collected and processed are:</i></p> <ul style="list-style-type: none"> <li>• Browser type</li> <li>• Computer operating system</li> <li>• Internet service provider</li> </ul>	<p><i>The following are examples of personal information that may be processed by PAHRC should you provide us with the informatio.</i></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Job title</li> <li>• Employer</li> <li>• Mailing address</li> <li>• Email address</li> <li>• Phone number</li> </ul>

If you email us, we may retain your email message, your email address, and our responses. If you register for the NHPD, we may retain your e-mail address and provide you with updates relating to the NHPD and preservation reports and webinars.

By submitting a telephone number to PAHRC you agree that a representative of PAHRC can contact you at the number you provide. However, your consent is not an obligation to receive any of our products and/or services.

Credit card information collected on the NHPD site is processed through a secure third-party site and is not retained by or visible to PAHRC staff.

**How Do We Use Your Personal Information?**

We may use your personal information for various reasons depending on your relationship and interactions with PAHRC. The table below provides some examples of ways we use your information based on your relationship with PAHRC:

<p><i>Users, Business Partners, &amp; Vendors</i></p>	<p><i>Website Visitors</i></p>
<ul style="list-style-type: none"> <li>• <i>Fulfill contractual obligations</i></li> <li>• <i>Analyze and evaluate vendor/partner qualifications</i></li> <li>• <i>Provide customer service</i></li> <li>• <i>Communicate with you</i></li> <li>• <i>Fulfill legal and regulatory requirements</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Demographic reporting</i></li> <li>• <i>Analysis of website statistics</i></li> <li>• <i>Enhance your experience</i></li> <li>• <i>Customize content and advertising</i></li> <li>• <i>Allow participation in promotions/contests</i></li> <li>• <i>Provide services upon request</i></li> </ul>

## **How Do We Share Your Personal Information?**

PAHRC will never distribute your personal information to another third party unless:

- You give consent (if required by law);
- It is necessary to allow our affiliates, attorneys, contractors, vendors, or agents to provide services to us;
- It is necessary to provide our products and services to you;
- It is necessary to allow third parties to offer products and services to you if you have given permission (as required by law); and/or
- We are required to disclose this information for legal or regulatory purposes.

We do not sell personal information to third parties.

Where we disclose personal information for a purpose set forth herein, we enter a contract with the third party that describes the purpose and requires the third-party recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

## **Legal Basis for Collecting and Processing Your Information**

We use your personal data in accordance with the terms of the applicable Privacy Policy implemented at the time your data is used. PAHRC will only collect and process your information if:

- You have provided explicit consent, which may be updated or withdrawn at any time. To withdraw consent please refer to the “How to Update Your Preferences” section of this Policy;
- If processing is necessary to perform services requested by you;
- If processing is necessary to fulfill contractual obligations related to an agreement for which you are a party to;
- We are required by law;
- A legitimate business interest exists and requires processing, unless your rights and interests outweigh such benefit; or
- If processing is necessary to protect your interests or the interests of another individual.

## **How Do We Collect Your Information?**

The method PAHRC uses to collect your data is also dependent on your relationship with us or your interactions with the organization. Information may be collected in one of the following three ways.

#### *1. Information Collected Automatically*

Certain non-personal information may be collected automatically when you first access the NHPD website. More specifically, this information may be made available to us through persistent and session cookies. Persistent cookies are tiny pieces of data that are stored on your device until expiration or deletion from the device, whereas session cookies are automatically removed from your device when the computer is turned off or the internet browser is closed. Cookies collect information such as your browser type, IP address, and anonymous traffic data. They further assist us in collecting important business and technical statistics to make your online experience more personalized and efficient. We do not track users across time or across websites, and we do not use flash cookies.

There are three different categories of cookies that we may use to collection information.

##### Required Cookies

The basic features and functions of the NHPD website may rely on required cookies to operate properly. These required cookies facilitate basic features such as the functioning of images that need to load or the process that allows users to select cookie preferences.

##### Functional Cookies

If used, this type of cookie will allow PAHRC to use your data to enhance your personal experience on the website as well as improve website performance. For example, it is this type of cookie that allows the website to save your log-in information, preventing you from having to log in each time you visit the website.

##### Third-Party Cookies

Data collected with these cookies may be shared with third-parties for ad targeting and advertising purposes, as well as to allow you to share certain pages with social networks and to post comments on the NHPD website. The information collected from these cookies helps to build an overview of how you interact with our website in order for us to optimize your experience.

PAHRC may also use other data-collecting technologies to automatically gather non-personal data in order to measure marketing efforts.

## *2. Information Provided by You*

Information PAHRC automatically collects, as outlined above, is non-personal information that does not identify you. PAHRC only receives and collects personal information when you provide such information in one of the following ways. Please note this list is not exhaustive and PAHRC may receive personal information you provide in other ways that may not be included below.

- Online forms
- As a user
- Subscribing to a newsletter
- Direct communications with employees of PAHRC

The type of information you provide is dependent on the form or way in which the data was submitted. A few examples of personal information that you may provide, which will be collected and processed, are: name, address, telephone number, email address, employer, etc.

## *3. Information Provided by Partners and/or Public Sources*

PAHRC, in some circumstances, may collect information about you from third parties, social media services, PAHRC partners, or other public sources. This information is used to gain a better understanding of the individuals that use PAHRC services and may be combined with other information we've received or collected.

## **How Do We Protect Your Information?**

We take all appropriate measures to protect the security of any and all information we collect or maintain. PAHRC uses methods such as encryption, firewalls, and information access controls. Despite this, the internet is not a secure medium, and no security system is 100 percent secure. Because of this, PAHRC cannot guarantee the absolute security of your data, and we do not assume responsibility for the data you submit to us. We cannot guarantee that the information communicated to us by you will be received or that it will not be altered before or after you transmit it to us. You agree that PAHRC is not liable for any loss or damage incurred due to any interception, modification, deletion, destruction, misappropriation, or use of information provided through our website. If you have any reason to believe your, or another individual's, data has been subject to accidental or unlawful access please contact us in accordance with the "How to Contact Us" section of this Privacy Policy.

## **Information Retention**

We retain personal information for the shortest possible period of time, as required to fulfill the purpose(s) for which it is collected, unless you continue to consent to ongoing processing or a longer retention period is required by law. After fulfillment is complete, or you withdraw your consent, your data will be deleted from our systems in accordance with our retention policies and procedures.

## **Children's Privacy**

By using our website or providing information to us, you affirm that you are at least 18 years of age or older. We are not liable for any damages that may result from a user's misrepresentation of age.

PAHRC's services are not directed at people under the age of 13, and we do not knowingly seek or collect personal information of children under this age. We request that children under the age of 13 do not provide us with personal information. No one under age 13 is authorized to submit or post any information, including personally identifying information, on our website. Under no circumstances may anyone under age 13 use our website or provide us with information. Parents or legal guardians of children under 13 cannot agree to these terms on their behalf.

## **How to Update Your Preferences**

Your consent (where required) or privacy preferences can be modified or withdrawn at any time using one of the following options:

- Contact PAHRC directly (please see "How to Contact Us" section below)

**FOR CALIFORNIA RESIDENTS:** If you reside in California and have provided personally identifiable information to us, you may request information about our disclosure of certain categories of personal information to third parties for their direct marketing purposes under California's Shine the Light law. Such requests must be submitted to us at one of the following addresses: 189 Commerce Court, PO Box 189, Cheshire, CT 06410-0189, or call 800-873-0242.

If you are a resident of California, effective January 1, 2020, you have the following rights under the California Consumer Privacy Act of 2018 ("CCPA"):

- to know what categories of personal information about you we have collected and used, including how the personal information was collected;
- to know what categories of personal information is being sold or disclosed and if it is being sold or disclosed to third parties and a list of categories of information that are sold; note that PAHRC does not sell your personal information;
- to opt out of the sale of your personal information ([click here](#) for more information on “Personal Information Sales Opt-Out and Opt-in Rights”);
- to access your personal information, including the right to download or transfer personal information collected during the previous 12 months ([click here](#) for more information on “Access to Specific Information and Data Portability Rights”);
- to request that your personal information be deleted ([click here](#) for more information on “Deletion Request Rights”); and
- to equal service and equal price for goods or services even if you exercise your rights under the CCPA.

While California residents have the right to opt out of the sale of their personal information under CCPA, we do not sell personal information to any third parties, and therefore, we have not included a “Do Not Sell My Personal Information” link on our site. If our practices change, we will update this Privacy Policy and take any other necessary action to comply with applicable law.

If you are a California resident and you want to exercise any of your rights as set forth above, please contact us at 800-873-0242 or [enterprise.compliance@housingcenter.com](mailto:enterprise.compliance@housingcenter.com). For all requests, it is helpful to put the statement “California Privacy Rights” in the body of your request, describe the nature of your request, and provide your name, street address, city, state, and zip code. In your request, you need to attest to the fact that you are a California resident and provide a current California address for our response. For more information [click here](#).

We will not discriminate against you for exercising your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**Accessibility Statement**

We are committed to making sure that our website is accessible to everyone. To access this notice in an alternative form, please email [enterprisecompliance@housingcenter.com](mailto:enterprisecompliance@housingcenter.com) or call 800-873-0242.

**How to Contact Us**

If you have a question or complaint regarding this policy or would like to correct or access personal information submitted to us through our website, contact us at:

PAHRC  
189 Commerce Court  
PO Box 189  
Cheshire, CT 06410-0189  
**Attn:** Corporate Compliance

Or at [enterprisecompliance@housingcenter.com](mailto:enterprisecompliance@housingcenter.com)

As applicable, you may also exercise your right to opt-out by contacting us.