

Fourmidable, Inc. Comprehensive Privacy Policy

Introduction

This Privacy Policy (Policy) describes the collection, use, disclosure, and retention of personal information by Fourmidable, Inc. (Fourmidable, we, our, or us). Fourmidable is committed to safeguarding the privacy and security of individuals whose personal information is handled in connection with our property management and related services. This Policy applies to individuals who inquire about, apply for, or reside in properties managed by Fourmidable, as well as users of our websites, platforms, and services. By engaging with Fourmidable in any capacity, individuals acknowledge the terms set forth in this Policy.

Definitions

1. **Personal Information.** Any information that identifies, relates to, describes, or is capable of being associated with a particular individual. This includes, but is not limited to, information described herein.
2. **Sensitive Personal Information.** Personal information revealing racial or ethnic origin, religious or philosophical beliefs, sexual orientation, gender identity, medical or health information (including disability status), account numbers in combination with security codes or passwords, biometric data, or data subject to special protections under applicable law.
3. **Processing.** Any operation or set of operations performed on personal information, whether or not by automated means, including collection, recording, organization, structuring, storage, alteration, retrieval, use, disclosure, dissemination, restriction, erasure, or destruction.
4. **Service Provider.** A third party engaged by Fourmidable to perform functions or services on our behalf, subject to contractual confidentiality obligations.
5. **Regulatory Agency.** Any governmental entity or authority, including but not limited to state housing agencies (such as the Michigan State Housing Development Authority (MSHDA)), the U.S. Department of Housing and Urban Development (HUD), and similar authorities overseeing affordable housing and housing compliance programs.

Categories of Personal Information Collected

1. **Identification Information.**
 1. Full legal name
 2. Date of birth
 3. Social Security number or other government-issued identification numbers

2. Contact Information.

1. Home address
2. Email address
3. Telephone numbers

3. Demographic Data.

1. Gender
2. Marital status
3. Family composition, ages, and relationships to applicant
4. Race, ethnicity, and national origin

4. Financial Information.

1. Employment status and employer contact details
2. Income information, including wages, benefits, public assistance, pensions, or child support
3. Asset information, including bank accounts, investment accounts, property ownership, and balances
4. Credit history and credit score (as obtained via credit reporting agencies)
5. Tax return and paystub documentation

5. Rental and Tenancy Information.

1. Previous and current addresses
2. Rental history, including landlord references, lease agreements, and payment records
3. Eviction history

6. Background and Screening Data.

1. Criminal background history
2. Sex offender registry status, where required by law

7. Special Compliance and Eligibility Data.

1. Income and disability status for compliance with Low Income Housing Tax Credit (LIHTC) and Project-Based Voucher (PBV) programs

2. Citizenship or eligible immigration status verification
 3. Documentation pertaining to reasonable accommodation requests
8. **Health and Disability Information.**
1. Nature of disability (where disclosed for reasonable accommodations or compliance purposes)
 2. Medical provider verification, if submitted
9. **Communication and Website Usage Data.**
1. Records of correspondence with Fourmidable
 2. Information submitted through our online platforms
 3. Internet or other electronic network activity information, including IP address and usage analytics
10. **Other Information.**
1. Emergency contact details
 2. Vehicle information for parking registration

The foregoing list is representative and may be updated and incorporates, by reference, all categories of personal information currently collected by Fourmidable as required for the operation, management, and regulatory compliance of our housing services.

Methods and Sources of Collection

1. **Direct Provision.** Personal information is collected directly from applicants, tenants, and authorized individuals through applications, forms, online platforms, correspondence, and in-person interactions.
2. **Third-Party Verification.** Information may be obtained from employers, financial institutions, government agencies, previous landlords, background check providers, and credit reporting agencies for verification purposes.
3. **Publicly Available Sources.** Where permitted by law, personal information may be gathered from publicly accessible records or registries.
4. **Automated Collection.** Some data, such as website analytics or network activity information, is collected automatically through technical means when individuals interact with our digital platforms.

Purposes of Collection and Processing

1. **Application and Tenancy Evaluation.** To assess eligibility for tenancy, comply with screening obligations, and process housing applications.
2. **Managing Tenancy and Provision of Services.** To manage lease agreements, communicate with residents, coordinate maintenance, and administer building amenities.
3. **Regulatory and Program Compliance.** To fulfill obligations under federal, state, and local housing programs, including but not limited to LIHTC and PBV requirements.
4. **Income and Disability Data Compliance.** Specifically, to determine and substantiate eligibility for subsidized housing programs, and to maintain appropriate records for audits.
5. **Credit and Background Assessment.** To evaluate tenant risk and ensure the safety and integrity of our housing communities.
6. **Legal and Security Purposes.** To comply with applicable laws, respond to lawful requests, enforce our rights, prevent fraud and misuse of services, and protect the security of our residents and assets.
7. **Business Operations.** For accounting, auditing, quality assurance, research, and internal recordkeeping.
8. **Responding to Inquiries and Requests.** To provide information, address requests for reasonable accommodations, and process modifications or updates to personal records.

Disclosure of Personal Information

1. **Service Providers and Contractors.** Personal information may be disclosed to third-party vendors, processors, or contractors, including property management software providers (such as AppFolio, Yardi, Buildium, or similar platforms), payment processors, and tenant management systems to provide services necessary for Fourmidable's operations, including payment processors, maintenance contractors, legal counsel, IT support, and background screening agencies, subject to confidentiality and data protection agreements.
2. **Affiliates.** Personal information may be shared within the Fourmidable group of companies for management, compliance, or operational reasons.
3. **Credit Reporting Agencies.** Financial and payment information may be disclosed to credit bureaus and background reporting agencies in connection with application and screening processes.
4. **Insurers and Brokers.** Information may be shared with our insurance providers, brokers, or claims adjusters as required for liability or coverage matters.

5. **Legal and Regulatory Authorities.** We may disclose information to government entities, law enforcement, judicial authorities, or regulatory agencies as required to comply with law, subpoena, court order, or program audits.
6. **Other Third Parties.** Subject to individual consent or instruction, limited information may be disclosed to emergency contacts, authorized representatives, or social service agencies as necessary to provide services or assistance.

Voucher Program Compliance Clause

Income and Disability Data Sharing for LIHTC/PBV Compliance.

Income and disability information collected by Fourmidable for the purpose of determining eligibility for the Low Income Housing Tax Credit (LIHTC) and Project-Based Voucher (PBV) programs is shared with state agencies, including but not limited to the Michigan State Housing Development Authority (MSHDA), and with the U.S. Department of Housing and Urban Development (HUD), for the purposes of regulatory audits, program monitoring, and compliance with applicable housing regulations. The sharing of such information is conducted strictly as required under governing law, program regulations, and audit protocols. No such data is disclosed beyond what is mandated for compliance, audit, or enforcement purposes.

Data Retention and Storage

1. **General Retention Principle.**

Fourmidable retains personal information for no longer than is necessary to fulfill the purposes for which the information was collected, including for the duration of tenancy, provision of services, legal compliance, dispute resolution, enforcement of agreements, and satisfaction of recordkeeping obligations.

2. **Program-Specific Recordkeeping.**

For residents and applicants subject to subsidized housing programs (including LIHTC and PBV), Fourmidable retains relevant records, including income and disability verifications, for the minimum periods required under applicable federal, state, and programmatic guidelines. Generally, LIHTC records must be retained for not less than six (6) years beyond the due date (with extensions as required by tax or program audits) and PBV records for not less than five (5) years after the end of participation or tenancy, or as otherwise required under HUD or MSHDA regulations.

3. **Retention for Legal Compliance.**

Where the law requires retention of certain records for longer periods (e.g., for litigation holds or regulatory investigations), Fourmidable will retain the relevant personal information for the required period.

4. **Disposal and Destruction.**

Upon expiration of the applicable retention period, personal information will be securely

destroyed or de-identified, subject to verification that no legitimate purpose exists for further retention.

Rights of Individuals

1. Right to Access.

Individuals have the right to request confirmation of whether Fourmidable maintains personal information about them and to access such information, subject to verification of identity and applicable legal exceptions.

2. Right to Rectification.

Individuals may request correction of inaccurate or incomplete personal information maintained by Fourmidable.

3. Right to Deletion.

Individuals may request deletion of personal information where retention of such information is not required by law, regulation, contract, or legitimate business need.

4. Right to Restrict or Object to Processing.

Where permitted by law, individuals may object to or request restrictions on the processing of their personal information.

5. Right to Data Portability.

Where applicable, individuals may request a copy of certain personal information in a format suitable for transfer to another entity.

6. Right to Non-Discrimination.

Fourmidable will not deny services, charge different prices or rates, or otherwise discriminate against any individual for exercising their privacy rights as provided by law.

Exercising Your Rights

1. Submission of Requests.

To exercise any of the rights described above, individuals may submit a written request to Fourmidable using the contact information provided in the Contact section of this Policy. Requests must include sufficient detail to allow Fourmidable to verify the requestor's identity, residence, and right to the information.

2. Response Procedures.

Fourmidable will acknowledge, evaluate, and respond to requests in accordance with applicable legal requirements. Where a request cannot be fulfilled in part or in whole, an explanation will be provided.

Security Measures

1. Administrative and Technical Safeguards.

Fourmidable implements administrative, technical, and physical security measures designed to safeguard personal information from unauthorized access, disclosure, alteration, or destruction.

2. Role of Service Providers.

Service providers and contractors are required by contract to implement appropriate data protection safeguards and to process personal information solely as directed by Fourmidable.

3. Incident Response.

In the event of a data security incident involving personal information, Fourmidable will undertake remedial action as required by law and notify affected individuals and authorities as appropriate.

Children's Privacy

1. Scope.

Fourmidable does not knowingly collect personal information from children under the age of 13 without verifiable parental consent, except as permitted or required in connection with housing applications and tenancy.

2. Requirements.

Where information relating to minors is collected for lawful purposes (such as for family-based eligibility verification), such data will be handled in accordance with this Policy and applicable law.

Additional Disclosures for Applicants and Tenants in Affordable Housing Programs

1. Compliance with Program Regulations.

Personal information submitted to Fourmidable for purposes of affordable housing programs is subject to additional requirements, disclosures, and retention timelines as required under LIHTC, PBV, HUD, and state housing agency guidelines.

2. Audit and Enforcement.

Records pertaining to income, disability status, citizenship or immigration status, and other programmatic eligibility factors may be reviewed by designated regulatory agencies for audit or enforcement purposes.

Amendments and Updates

Fourmidable reserves the right to amend this Policy from time to time in its sole discretion to reflect changes in our practices, applicable law, or regulatory guidance. Notice of material changes will be provided through effective means, including updates on our website or direct

communication. This Policy replaces all previous versions and is effective as of the date listed below.

Contact Information

For questions, concerns, requests to exercise your rights, or to obtain a copy of this Privacy Policy in an alternative format, please contact Fourmidable, Inc., as follows:

Fourmidable, Inc.
32500 Telegraph Rd Suite No. 200,
Bingham Farms, MI 48025
info@fourmidable.com
(248) 593-4600

Fourmidable, Inc., endeavors to respond to all inquiries and requests in a timely and lawful manner. Individuals may also escalate unresolved concerns to the applicable regulatory authority.

Effective Date

This Privacy Policy is effective as of April 21, 2026

This document constitutes the entire Privacy Policy of Fourmidable, Inc., and supersedes any prior statements or policies.