

Data Privacy Notice

Effective: January 1, 2025

Palmer Asset Management LLC and its affiliated companies (collectively “**we**,” “**us**,” or “**our**”) are committed to protecting individual privacy of our tenants (“**Tenants**”).

In maintaining our residential leases with Tenants, we use third-party products and services to automate and simplify tasks such as application, renewal accounting and billing, and communication. To use these products and services, we must keep and periodically disclose Tenants’ personal information.

Accordingly, it is important we provide transparency regarding our collection, use, and disclosure of information that relates to, or can reasonably be linked to, a person (“**Personal Data**”). This Data Privacy Notice (“**Notice**”) governs our collection, use, and disclosure of Tenants’ Personal Data in connection with our leasing residential units.

We may periodically update this Notice to reflect changes in our practices, legal requirements, and other services. We will let you know when we update this Notice by updating the effective date above or noting the date of any changes elsewhere on this Notice. Any changes will become effective when we post the updated Notice on our website.

Personal Data We Collect

We collect Personal Data in various ways, such as when Tenants: apply for residence, pay rent or make any inquiries with us. We may also collect Personal Data from other sources, including publicly-accessible databases and third-party services.

We collect the following Personal Data:

- **Personal Identifiers**, like first and last name, email address, phone number, login credentials, government-issued identifiers (e.g., SSN), and government-issued identity documents (e.g., driver’s license);
- **Employment Information**, like employer name or company affiliation, job title, work email address, work phone number; and
- **Commercial Information**, like credentials to online services, bank account number, credit or debit card numbers, credit information, financial account information, account balances, and billing information.

How We Use Personal Data

We use Personal Data to:

- Qualify Tenants for leasing;
- Communicating with our Tenants;
- Administer Tenant accounts;
- Processing and complete lease transactions; and
- Accounting, recordkeeping, and backup.

Whom We Disclose Personal Data To

We disclose Personal Data that we collect to/for:

- **Service Providers**, such as entities or individuals who perform certain services necessary to run our business. We may disclose Personal Data to Service Providers to the extent necessary to run our business.
- **Legal Requests**, such as regulatory and reporting requirements or requests from government authorities or law enforcement.
- **Business Transfers**, such as sale or transfer of some or all our assets or business in which Personal Data held by us are among the assets to be transferred.
- **Enforcement of Our Rights**. We may disclose Personal Data to the extent necessary to enforce or protect our rights, privacy, safety, property, or that of Tenants.

How We Protect Personal Data

We seek to use commercially reasonable organizational, technical, and administrative measures to protect Personal Data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be one hundred percent (100%) secure. Tenant has reason to believe that their interaction with us is no longer secure, we ask they immediately notify us.

Retaining Personal Data

We retain Personal Data for the duration of Tenants' relationships with us, and where we have an ongoing legitimate business need to do so (e.g., legal or accounting compliance, enforcement of our rights). Retention periods may be extended if we are required to preserve Personal Data because of litigation, investigations, and other similar proceedings, or if a longer retention period is required or permitted by applicable law.

How to Contact Us

If you have questions or complaints related to our practices with respect to the collection, use, or disclosure of Personal Data, please email us at propertymanager@palmerasset.com, or call 603-685-0112. If by physical mail, please send to:

Palmer Asset Management LLC
16 Industrial Way
Salem, NH 03079