

PRIVACY POLICY

Introduction

This Privacy Policy describes how Altair Holdings, LLC. DBA Altair Real Estate Services (“we,” “us,” “our,” or “Altair”) collects, uses, and protects personal information from our residents and prospective residents (“Residents”). We use Entrata and other property management tools to manage our properties and process resident information. This policy explains your rights regarding your personal information and how you can exercise those rights.

Definitions

- **Personal Information:** Information that identifies, relates to, describes, or is capable of being associated with a particular individual
- **Processing:** Any operation performed on personal information, including collection, use, storage, disclosure, or deletion
- **Service Providers:** Third-party companies that process personal information on our behalf
- **Cookies:** Small text files placed on your device when you visit our websites to help us understand usage patterns

Important Notice Regarding Our Service Providers

Altair partners with leading property management software providers to manage your personal information securely and efficiently. Our primary service providers include:

- **Entrata, Inc.:** Provides our resident portal, payment processing, and property management platform
- **PMware Inc.:** Provides additional property management and data processing services

These service providers maintain their own privacy policies governing how they handle and protect data as our service providers. While these companies store and process your information on our behalf, Altair remains primarily responsible for the collection, use, and protection of your personal information. When you use services like Entrata’s ResidentPortal or other provider platforms, you are interacting with systems that these companies provide to us, but we remain responsible for your data and how it is used.

For detailed information about how these service providers process your data, you can review their respective privacy policies:

- Entrata’s Privacy Policy: <https://entrata.com/privacy-policy>
- PMware’s Privacy Policy: <https://pmware.biz/privacy-policy>

Information We Collect

We collect personal information that is necessary for property management and leasing purposes, including:

Personal Identifiers

- Full name
- Email address
- Account login credentials
- Government-issued identifiers (e.g., Social Security number)
- Government-issued identity documents (e.g., driver's license)
- Current and previous addresses
- Phone numbers
- Emergency contact information
- Date of birth

Financial and Commercial Information

- Bank account information
- Credit/debit card numbers
- Payment history
- Credit report information
- Income verification documents
- Account balances
- Billing information
- Records of purchases and payments
- Employment information

Property-Related Information

- Lease agreements and related documents
- Maintenance requests and service records
- Access card and key fob information (excluding biometric data)
- Package delivery information
- Parking information
- Pet information (if applicable)
- Move-in/move-out inspection records
- Visitor logs (where applicable)

Internet or Network Activity Information

- IP addresses
- Login credentials for resident portals
- Device information when accessing our online services
- Usage data related to resident portal activities
- Interactions with our websites and resident portals

- Browser type and version
- Operating system information

Cookies and Tracking Technologies

Our websites use cookies and similar tracking technologies to:

- Maintain your session when logged into the resident portal
- Analyze website usage and improve our services
- Remember your preferences
- Ensure website security

You can control cookie settings through your browser preferences. Disabling certain cookies may limit functionality of our online services.

How We Use Your Information

We use your personal information for the following purposes:

- Processing rental applications and screening
- Managing lease agreements and renewals
- Processing rent payments and other charges
- Responding to maintenance requests
- Communicating about property-related matters
- Ensuring property security and safety
- Complying with legal obligations
- Improving our services and resident experience
- Administering your resident portal account
- Verifying your identity and preventing fraud
- Responding to your inquiries and providing customer service
- Conducting property inspections and assessments
- Managing utility services (where applicable)

Legal Basis for Processing

We process your personal information based on the following legal grounds:

- **Contract Performance:** To fulfill our obligations under your lease agreement and provide housing services
- **Legitimate Interests:** To manage our properties effectively, ensure security, prevent fraud, and improve our services
- **Legal Obligation:** To comply with applicable laws, regulations, court orders, and legal processes (e.g., fair housing laws, tax reporting requirements, eviction proceedings)
- **Consent:** For optional services, marketing communications, or where specifically required by law

- **Vital Interests:** In emergency situations to protect life or physical safety

Information Sharing

We may share your personal information with:

- Property management software providers (primarily Entrata, Inc. and PMware Inc.)
- Payment processors for rent and fee collection
- Credit reporting agencies for application screening and payment reporting
- Maintenance service providers and contractors
- Utility companies (where we manage utilities)
- Legal and regulatory authorities when required by law
- Property owners and investors (in anonymized or aggregated form unless otherwise required)
- Insurance companies for claims processing
- Emergency responders when necessary for safety
- Your authorized representatives (with proper verification)
- Debt collection agencies (if applicable)

We do not:

- Sell personal information to third parties
- Share personal information for cross-context behavioral advertising
- Share personal information with third parties for their own marketing purposes without your consent

International Data Transfers

Some of our service providers may store or process data outside of the United States. When personal information is transferred internationally, we ensure appropriate safeguards are in place to protect your data in accordance with this policy and applicable laws.

Your Privacy Rights

As a resident, you have the right to:

- **Access** your personal information we maintain
- **Correct** inaccurate personal information
- **Delete** personal information (subject to legal retention requirements)
- **Portability** - receive your data in a structured, commonly used format
- **Object** to certain processing of your information
- **Withdraw consent** for optional data processing
- **Non-discrimination** for exercising your privacy rights

State-Specific Rights

Depending on your state of residence, you may have additional rights:

California Residents (CCPA/CPRA):

- Right to know categories and specific pieces of personal information collected
- Right to know purposes of collection and categories of third parties with whom we share data
- Right to opt-out of sale of personal information (we do not sell personal information)
- Right to limit use of sensitive personal information

Virginia, Colorado, Connecticut, and Utah Residents:

- Similar rights to access, correction, deletion, and portability
- Right to opt-out of targeted advertising (we do not engage in targeted advertising)

Data Subject Access Requests (DSARs)

You can submit a Data Subject Access Request (DSAR) in two ways:

1. Through the Entrata resident portal for information stored within Entrata
2. By contacting our privacy team directly at info@altairre.com for information stored in other systems

We will:

- Acknowledge your request within 10 business days
- Verify your identity to protect your information
- Respond to your request within 30-45 days (depending on applicable law)
- Provide one free response per year (additional requests may incur a reasonable fee)
- Explain any denials with information about appeal processes

Data Security

We implement appropriate technical and organizational measures to protect your personal information, including:

- Encryption of sensitive data in transit and at rest
- Multi-factor authentication for system access
- Access controls and role-based permissions
- Regular security assessments and audits
- Employee training on data protection and privacy
- Secure data storage and transmission protocols
- Incident response procedures
- Physical security measures at our properties

Data Retention

We retain your personal information for specific periods based on the type of data and legal requirements:

- **Lease and rental records:** 7 years after lease termination
- **Financial records:** 7 years for tax and accounting purposes
- **Maintenance records:** 3 years after completion
- **Application records (unsuccessful):** 1 year
- **Security footage:** 30-90 days unless needed for investigation
- **Marketing preferences:** Until withdrawal of consent

We may retain certain information longer if required by law, legal proceedings, or legitimate business purposes.

Data Breach Notification

In the event of a data breach that poses a risk to your personal information, we will:

- Notify affected residents via email and/or portal notification within 72 hours when feasible
- Provide information about the breach, data involved, and potential risks
- Offer guidance on protective measures you can take
- Provide credit monitoring services when appropriate
- Comply with all applicable breach notification laws in Pennsylvania, New York, Louisiana, and other applicable jurisdictions

Automated Decision-Making

We may use automated systems for:

- Initial application screening based on credit scores and income verification
- Rent payment processing
- Maintenance request routing

You have the right to request human review of automated decisions that significantly affect you.

Children's Privacy

We do not knowingly collect personal information from persons under the age of 18 without authorization by a parent or legal guardian. Residents must be 18 or older to sign a lease agreement. If you believe we may have inadvertently collected information from a minor without proper authorization, please contact us at info@altairre.com.

Updates to This Policy

We may update this Privacy Policy periodically to reflect changes in our practices or legal requirements. We will notify you of any material changes through:

- Email notification
- Resident portal announcement
- Notice posted at property offices

The “Last Updated” date at the bottom of this policy indicates when it was last revised.

Contact Us

If you have questions about this Privacy Policy or our privacy practices, please contact us at:

Altair Holdings, LLC. DBA Altair Real Estate Services

Privacy Officer

Email: info@altairre.com

Phone: 814.622.1121

Corporate Headquarters:

155 E. 10th St.

Erie, PA 16501

We provide property management services nationally across the United States.

For privacy-related complaints that we cannot resolve directly, you may contact your state’s Attorney General’s office.

Last Updated: September 13, 2025

Effective Date: September 13, 2025