

## Privacy Policy

Revision A

This notice is being provided to you on behalf of 77<sup>th</sup> Meridian, LLC. It describes how information about you is handled and the steps we take to protect your privacy. We call this information Personal Identifiable Information (PII) data or PII. If your relationship with us ends, we will continue to handle PII about you the same way we handle current clients, tenants, and employee PII.

### Protecting Customer PII

77<sup>th</sup> Meridian, LLC has serious regard for the PII entrusted to us. We maintain physical, electronic, and procedural safeguards to protect PII data. The only persons who are authorized to have access to PII data are those who need access to do their jobs. We require them to keep the data secure and confidential. This policy addresses the sharing, use and storage of PII data:

- a. All PII shall be shared only when authorized by the PII owner.
- b. PII elements shall be selectively placed in the care of certain business services, with known PII policies, only as necessary to conduct day-to-day business.
- c. PII retained and maintained for reference and use in the normal course of business, shall be protected from electronic theft, and if stolen, made extremely difficult to exploit.

### Information We Collect

We collect PII data you give us, and data about the products and relationships you have with us, so that we can offer products and services meeting your needs. The following elements are considered PII, when associated with the name of the individual:

- |                            |                              |                                    |
|----------------------------|------------------------------|------------------------------------|
| a. Social security number. | e. Time rate of income       | i. Bank routing and account number |
| b. Driver's license number | f. Current or past employers |                                    |
| c. Date of birth           | g. Credit score              |                                    |
| d. Place of birth          | h. Credit report             |                                    |

### Sharing of PII

We may share PII data with affiliated companies, contractors, or professionals so that they can perform services for us or on our behalf. To that end we will:

- a. Obtain a description of how PII data in their possession will be protected from unauthorized access.
- b. Minimize the number of PII elements to be shared with those external entities.

We may also disclose PII data as permitted or required by law, for example:

- |                                 |  |
|---------------------------------|--|
| a. To law enforcement officials | e. To legal council if it is necessary to bring legal action against you to satisfy contractual obligations. |
| b. In response to subpoenas     |  |
| c. To regulators or inspectors  |  |
| d. To prevent fraud             |  |

### Use of PII

In order to conduct certain business, it is necessary to permit some PII elements to be temporarily held for safekeeping by affiliated companies, contractors, professionals, or on-line software subscription services for the exclusive use/and access by 77<sup>th</sup> Meridian, LLC. We do not disclose PII data to 77<sup>th</sup> Meridian affiliates or other companies to allow them to market their products or services to you. We may tell you about a product or service that a 77<sup>th</sup> Meridian, company or other companies offer. If you respond, that company will know that you were in the group selected to receive the information.

### Storage of PII

In order to carry out day-to-day business, PII must be retained, maintained, and accessible for later use, yet protected from unauthorized access or theft. To fulfill this requirement:

- a. PII data shall be organized by PII-owner or group-of-PII-owners.
- b. PII data stored on paper shall be secured in lockable file cabinets with restricted access.
- c. PII data stored electronically shall be encrypted at the PII-owner or group-of-PII-owners level. Knowledge of decryption passwords shall be restricted.
- d. PII data stores shall not be accessible from the Internet.