

HEATH PROPERTIES PRIVACY POLICY FOR

PERSONAL INFORMATION

In compliance with the requirements of G.L. c. 93H, Heath Properties (hereinafter, “Management”) has adopted the following privacy policy with respect to the handling of personal information of all applicants, tenants, and guarantors:

1. ‘Personal information’ for the purposes of this policy shall be defined as social security numbers, drivers license numbers and/or state-issued identification card numbers, financial account numbers, and credit/debit card numbers, together with any association security code(s), access code(s), personal identification number(s), or passwords that would permit access to a resident’s financial account.
2. Only employees who have been trained by Management on appropriate measures for handling personal information shall be permitted to do so.
3. All documents containing personal information that can be practicably be shredded shall be shredded as soon as practicable.
4. All documents containing personal information that Management deems should not be shredded and should instead be preserved and/or stored shall be preserved and/or stored in secure and locking file cabinets in offices that are locked during non-business hours. Access to such personal information shall be limited to those Management employees who have been trained by Management on appropriate measures for handling personal information, and Management’s attorneys, who are aware of and in compliance with applicable privacy laws relating to such personal information.
5. Appropriate measures shall be taken to ensure the security of any documents being transported off of Management’s premises, including but not limited to having such documents safely couriered to their destination and/or transporting such documents by an overnight mail provided that employs a tracking system.
6. Management will use its best efforts to ensure that any credit search/reporting agency to which any personal information is transmitted employs a privacy policy that is in

compliance with the provisions of Massachusetts law relating to handling personal information.

7. Management will limit personal information collected and/or stored to that information that is practicably necessary for business purposes.
8. Management will adhere to 201 C.M.R. 17.04 with regard to computerized storage of any personal information, and will use best efforts to ensure the security of any portable computerized device that may store private information.
9. Management will endeavor to monitor compliance with its privacy policy regularly, and will endeavor to review its privacy policy at least annually.
10. Management will document any violations of its privacy policy and/or any breaches of security that could compromise the privacy of any personal information.
11. Management's privacy policy will apply to all personal information that must be protected pursuant to 201 C.M.R. 17.01.
12. Violation of the terms of this policy by employees may need to disciplinary actions that could include reprimand and/or termination.
13. Terminated employees will have their permitted access to any stored personal information terminated immediately upon their termination.