



Privacy Policy

1. Personal Information

Personal information is:

- (1) Information in a consumer report; or
- (2) An individual's first name or initial and last name in combination with any of the following:
 - (a) Birth date;
 - (b) Social security number or other government issued identification number;
 - (c) Mother's maiden name;
 - (d) Unique biometric data (fingerprint, voice print, retina image);
 - (e) Unique electronic identification number or routing code;
 - (f) Telecommunication access devices including debit or credit card information; or
 - (g) Financial institution account or information.

A consumer report is a report related to a person's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living prepared by or obtained from an agency that collects such information such as a credit reporting agency.

2. Collection of Personal Information

This company obtains personal information in the following ways:

- (1) Consumer reports from reporting agencies to which this company subscribes in connection with lease applications, loan applications, or for other reasons that the consumer may authorize this company to obtain;
- (2) Lease applications a prospective tenant completes;
- (3) Internet websites that provide such information for public use
- (4) Loan applications a borrower or buyer completes;
- (5) Other real estate related forms the customer or client completes in or related to a transaction; and
- (6) Tax reporting forms that the customer or client is required to complete and which are given to this company.

When completing the forms required above, the customer or client may send the information to this company by mail, fax, personal delivery, or by e-mail. Customers or clients may occasionally provide personal information to this company or its agents by other means such as telephone calls, fax messages, or e-mail messages in order expedite a transaction in which the customer or client is involved.

3. Use of Personal Information

Personal Information from Prospective Tenants: The personal information that prospective tenants provide to this company is primarily used to obtain consumer reports (credit checks). It may also be used to perform background checks and rental history searches. The information in the consumer reports may be discussed with landlords for whom this company manages property. This company also reports information to credit and consumer reporting agencies and uses personal information to complete those reports.

Personal Information from Owners of Properties Managed by the Company: When this company acts as a property manager for a property owner, the company uses the property owner's personal information only: (a) to deliver the required management services; (b) to file any required reports with governmental agencies (for example, the IRS); or (c) for other purposes the property owner may authorize.

Personal Information from Clients: When this company represents a person (buyer, seller, landlord, or tenant) in a transaction the agent servicing the client may, on the client's behalf and at the client's instruction, convey personal information he or she provides to the agent to service providers (for example, mortgage lenders and title companies) as those service providers may require for the products or services the client needs or requests. If this company represents a prospective tenant in a lease transaction, the personal information may, on the tenant's behalf and with the tenant's knowledge, be discussed with and provided to landlords or their agents. This company and its agents exercise reasonable discretion when discussing any personal information with others.

4. Records Retention Policy

Wakefield, REALTORS has adopted the following records retention policy:

1) Tenant information is retained in hard copy on site for all active tenants and for a minimum of one year after an active tenant has vacated a leased property. If a tenant has a remaining balance per his/her Itemization of Security Deposit, the tenant's information is retained on site for a minimum period of three years after the tenant has vacated the leased property. Tenant information is stored in secure areas that are accessible only to authorized staff members of Wakefield, REALTORS. Tenant information is retained in a secured off-site storage unit for a minimum period of two additional years, and if a tenant has a remaining balance per his/her Itemization of Security Deposit, the tenant's information is retained indefinitely. Tenant information includes, but is not limited to the following:

- Residential Lease Application
 - Residential Lease and all applicable addendums and attachments
 - All correspondence between Wakefield, REALTORS and Tenant
 - Itemization of Security Deposit and all applicable documentation
- Electronic tenant data is retained indefinitely in a secured Cloud-based Property Management Program.

2) Residential Lease Applicant information is retained in hard copy on site for all rejected and withdrawn applications for a minimum of one year. Applicant information is stored in a secured area that is accessible only to authorized staff members of Wakefield, REALTORS. Applicant information is retained in a secured off-site storage unit for a minimum period of two years. Applicant information includes, but is not limited to the following:

- Residential Lease Application
- Credit Report
- Rental History Verification
- Employment Verification
- Correspondence between Wakefield, REALTORS and Applicant
- Application Disposition Letter

Electronic applicant data is retained indefinitely in a secured Cloud-based Property Management Program.

3) Owner information is retained in hard copy on site for all active property owners and for a minimum of one year after the Management Agreement between Wakefield, REALTORS and the property owner has been terminated. If a property owner has a remaining balance, the property information is retained on site until the balance has been satisfied. Owner information is stored in a secure area that is accessible only to authorized staff members of Wakefield, REALTORS. Owner information is retained in a secured off-site storage unit for a minimum period of three additional years. Owner information includes, but is not limited to the following:

- Residential Leasing and Property Management Agreement
- Owner Income and Expenses
- ACH Authorization
- IRS W9
- Correspondence between Wakefield, REALTORS and Property Owner

Electronic owner data is retained indefinitely in a secured Cloud-based Genesis2 program through Yardi.

4) Property information is retained in hard copy on site for all active properties and for a minimum of one year after the Management Agreement between Wakefield, REALTORS and the property owner has been terminated. If a property owner has a remaining balance, the property information is retained on site until the balance has been satisfied. Property information is stored in secure areas that are accessible only to authorized staff members of Wakefield, REALTORS. Property information is retained in a secured off-site storage unit for a minimum period of three additional years. Property information includes, but is not limited to the following:

- Multiple Listing Sheets
- Property Reviews
- Comparative Market Analyses
- HOA documentation
- Warrantees
- Other documentation pertinent to the property

Electronic property data is retained indefinitely in a secured Cloud-based Genesis2 program through Yardi.

5) Vendor information is retained in hard copy on site for all active vendors and for vendors who have been inactive for a minimum period of three years. Vendor information is stored in a secure area that is accessible only to authorized staff members of Wakefield, REALTORS. Vendor information includes, but is not limited to the following:

- Vendor Guide including Vendor Information and Acknowledgement and IRS W9
- Correspondence between Wakefield, REALTORS and Vendor

Electronic vendor information is retained indefinitely in a secured Cloud-based Genesis2 program through Yardi.

6) Vendor invoices are retained in hard copy on site for the current year. Vendor invoices are stored in a secure area that is accessible only to authorized staff members of Wakefield, REALTORS. Vendor invoices are retained in a secured off-site storage unit for a minimum period of three additional years.

7) Real Estate Closing and DFT (Deal Fell Through) information is retained in hard copy on site for a minimum of one year. Sales information is stored in secure areas that are accessible only to authorized staff members of Wakefield, REALTORS. Real Estate Closing and DFT information is retained in a secured off-site storage unit for a minimum period of three additional years. Real Estate Closing and DFT information includes, but is not limited to the following:

- Contract
- Multiple Listing Sheet
- Comparative Market Analysis
- Correspondence between Wakefield, REALTORS and Client
- Other documentation pertinent to the transaction

Electronic Real Estate Closing and DFT data is retained indefinitely on a secured server owned by Wakefield, REALTORS.

8) Corporate Information is retained in hard copy on site for a minimum of one year. Corporate information is stored in secure areas that are accessible only to authorized staff members of Wakefield, REALTORS. Corporate information is retained in a secured off-site storage unit for a minimum period of two additional years. Corporate information includes, but is not limited to the following, and is stored as designated:

- Tax Returns (1 year on site/6 additional years off-site)
- Bank Statements and Reconciliations (1 year on site/2 additional years off-site)
- Employee and Payroll Information (remains on site)
- Other documentation pertinent to the company (remains on site)

Electronic Corporate data is retained indefinitely on a secured server owned by Wakefield, REALTORS.

5. Destruction of information that is retained in hard copy as described herein:

When information has been retained for the required minimum period of time, it is relinquished to a document destruction service that complies with legislation and ensures that our tenant, applicant, owner, property, vendor, client, employee and confidential business information is kept secure at all times.

6. Erroneous Records:

If this company erroneously reports information to a consumer reporting agency, the company will act to correct the information in the company's records and request the reporting agency to correct the information in its records promptly after the company has learned and determined that the report was in error.

If this company maintains an erroneous record that a consumer has issued a dishonored check, the company will promptly delete the record after the company and consumer agree that the information is in error or after the consumer provides the company with a law enforcement agency report stating that the dishonored check was not authorized.