

Property Owners' Exchange, Inc. Privacy Policy

As a consumer reporting agency governed by the federal Fair Credit Reporting Act (FCRA) among other applicable state and federal laws, Property Owners' Exchange, Inc. (POE) is committed to protecting your privacy.

POE has established policies and procedures dedicated to maintaining the privacy of personal information while providing its clients with the necessary information for making informed decisions involving background screening. This policy incorporates the practices of POE as they pertain to data submitted by clients, applicants, others, and to information secured from third parties and other sources in connection with background screening information. All data is collected, stored, and delivered with applicable law, including the Fair Credit Reporting Act and other local, state, and federal laws. Personal information will only be released to the entity or entities to whom the applicant consented to receive such information, to those who require the personal information in order to conduct the necessary screening, and to those employers, landlords and other reference providers who require personal information before providing verifications. Personal information will not be released to any other individual and will not be used for any other purpose by POE.

Security:

As a consumer reporting agency, we are actively engaged in ensuring our systems and data are secure. Once we receive personally identifiable information, we take steps to protect its security on our systems.

POE's data is transferred utilizing secure socket layer (SSL) technology and is User ID and Password protected. Our servers reside at a state-of-the-art collocation facility that is staffed on-site 24/7 to provide immediate response to any incident. Access to the facility is restricted to authorized personnel and is secured by both password-protected keypads and biometric scans.

All waste paper documents are shredded onsite and security equipment monitors and control the entrances to our premises.

Use of Information:

Personal information received by POE may include, but is not limited to, residential history, personal history including name, date of birth, Social Security Number, Motor Vehicle Operator's License Number, Professional License information, employment history, education and other credentials. POE will use information provided by the client, applicant, and any other information provided by third-parties, only for the execution of producing a background screening report for the client placing the order. POE will not process personal information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the individual. We reserve the right to employ other organizations or individuals as our subcontractors, to perform functions on

behalf of POE. These organizations and individuals will not share information with any third party, other than POE subcontractors, clients, or applicants.

Confidentiality:

POE will maintain the confidentiality of all personal information and will under no circumstances sell or distribute personal information to a third party, except as provided in this Privacy Policy or when required to do so by law. This Privacy Policy will survive the transfer of ownership of POE, should such an event occur.

Retention:

Pursuant to the FCRA, we must maintain any reports which we generate for a minimum period of five years.

POE maintains written or electronic copies of information received in conjunction with services rendered for a period of five years. Information is subsequently destroyed either electronically or manually.

Choice:

Applicants of our clients will be advised by our clients that a background check will be conducted. Individuals who do not want personal data made available to our client should not submit the information in question to POE via our client. Consent forms either from POE or POE's client indicate the consumer agrees to provide personally-identifying information, and consent to POE use of that information in accordance with this privacy policy.

Access:

As the subject of a consumer report, a consumer has the right to any reports POE produces and maintains on him or her once every twelve months. Consumers may contact POE via the contact information below to obtain a report including this information, if such a report has been created. In accordance with this policy and our efforts to maintain the privacy of personal data, POE requires proof of a consumer's identity prior to delivering any personal information. Information will be mailed via U.S. Postal Service within 5 days of a consumer's request, in the same format it was delivered to POE's client. There will be no expense to a consumer for this information. Requests should be mailed to Property Owners' Exchange, Inc. 6630 Baltimore National Pike, Suite 208, Baltimore, MD 21228 and include the consumer's date of birth, last four digits of Social Security Number, current address and telephone number. If a consumer believes any information in POE's report is incorrect, he or she should contact POE directly to discuss this with the support representative identified below.

Accuracy:

POE will make every reasonable effort to ensure the accuracy of information delivered. POE relies on other entities, including but not limited to, courts, education institutions, applicant's employers, individuals and other sources for its information, and therefore cannot guarantee the accuracy or timeliness of information reported. This Privacy Policy may be modified or amended at any time without prior notice. Please review this Privacy Policy prior to contacting POE with requests or questions.

Additional Information:

For assistance with additional information regarding POE's privacy practices or policies, contact:

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