

GENERAL PRIVACY POLICY FOR ALPS, INC.

The information in this policy applies for office policies and online policies.

1. Possible Personal Information Collected

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) unique electronic identification number our routing code;
 - (d) financial institution account or information;
 - (e) e-mail address.

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. Method By Which Personal Information is Collected

This company obtains personal information in the following ways:

- (1) in 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) in management agreements a client completes;
- (3) in lease applications a prospective tenant completes;
- (4) in auto deposit authorization forms a client completes;
- (5) in other real estate related forms the customer or client completes in or related to a transaction; and
- (6) in tax reporting forms that the customer or client is required to complete and which are given to this company;
- (7) at our website.

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 to expedite a transaction in which the customer or client is involved. Changes in personal information must be submitted in writing.

3. How and when is the personal information used?

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 criminal 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 reporting agencies and uses personal information to complete those reports. Social security numbers and driver's license numbers are kept on file but not placed on any Disposition of Security Deposit form prepared after May 1, 2007.

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); (c) to establish ACH deposits; or (d) for other purposes the property owner may authorize, such as providing utilities.

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. Methods By Which The Personal Information is Protected

Written files in this company are kept under lock and key.

Electronic records are protected under an access name and password assigned to persons in this company.

This company and its agents and employees exercise reasonable discretion when discussing any personal information with others and releases personal information to others only as described by this policy.

This company does not permit its employees or agents to make unauthorized copies of consumer reports or records of insurance claims. The consumer reports retained in the company's files are not to be accessed in the future as a convenience to customers or clients.

Any individual outside agents that work with this company are independent contractors and the agent with whom a customer or client works with may maintain a separate transaction file. The company instructs its agents to not permit other persons to access the personal information in files the agents maintain. The company instructs its agents to protect the personal information in the agents' files in the same manner as described in this policy.

5. Access to Personal Information

The following personnel have access to personal information in this company's files:

- (1) the agent or broker who is servicing or coordinating the transactions;
- (2) the office manager to whom the agent reports;
- (3) application processors;
- (4) employees who need to access the information to assist agents, brokers, accountants, office manager in processing or performing a task

Property owners for whom the company manages properties do not have access to personal information in the company's files. However, the company and its agents may discuss the information in a tenant's consumer report or lease application with a property owner.

Personal information from a buyer, seller, landlord, or tenant may be discussed with others (such as mortgage lenders or prospective landlords) only as is reasonably necessary to negotiate or close the

transaction or to provide the services the customer or client seeks from this company. Requests for personal information must be submitted in writing.

This company may, at the customer's or client's request, provide personal information to service providers in a transaction such as a title company or mortgage company if it is necessary to expedite or complete a transaction.

If the company is required by law to allow others to access the personal information in the company's files, the company will comply with the law (for example, compliance with court orders, subpoenas, or governmental investigations). The company will also allow law enforcement agencies access to personal information in order to cooperate with such investigations.

6. Disposal of Personal Information

Personnel are not to destroy documents without permission of management. The company uses reasonable measures to dispose of personal information. Personal information is usually disposed of by erasing electronic files by means that make the files unreadable or undecipherable, or by eradicating personal information from documents or electronic files in way that make the personal information unreadable. Paper documents are shredded in-house or the firm may employ a document and record destruction company.

7. 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.

Notice: This company asks any person who provides personal information to this company or one of its agents to identify the information at that time as "personal information."

8. Online Privacy

ALPS is committed to online security. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of personal information. All ALPS employees with access to personal information obtained on the ALPS web site are bound to adhere to our privacy policies regarding personal information.

To access client and tenant statements online, clients and tenants create logon accounts with usernames, passwords and a property manager ID.

a. Personal Information Online

ALPS collects personal information online including names, postal and e-mail addresses, phone and facsimile numbers. ALPS does not knowingly collect or maintain any personal information from children under the age of 18.

b. Sharing of Personal Information

Unless you otherwise consent, we will use your personal information only for the purpose for which it is submitted such as to reply to your emails and handle your requests. ALPS will route the request or general email to the appropriate staff member who can best process the request or email. We never sell or rent your personal information.

c. Special Circumstances Under Which We May Share Your Information

1. Where release is required by law (for example, a subpoena) or regulation or requested by a governmental agency;
2. Where records indicate that a person may be engaged in fraudulent activity or other deceptive practices that a governmental agency should be made aware of;
3. To appropriate persons, where your communication suggests possible harm to other;

d. Help Us To Keep Your Personal Information Accurate

If your personal information in our files changes, please e-mail us with the new information at info@alpsmgmt.com

e. Computer Tracking and Cookies

Our site logs do generate certain kinds of non-identifying site usage data, such as the number of hits and visits to our site. This information is used for internal purposes by technical support staff to provide better services to the public and may also be provided to others, but again, the statistics contain no personal information and cannot be used to gather such information.

A cookie is a small amount of data that is sent to your browser from a web server and stored on your computer's hard drive. ALPS uses cookies to provide access to certain areas of the site that require a log on. You can still use most of the ALPS site if your browser is set to reject cookies, but you will have to enable cookies to use any portion of the site requiring a log on.

f. Problems or Complaints with ALPS Privacy Policy

If you have a complaint about ALPS' compliance with this privacy policy, you may contact us at info@alpsmgmt.com