

PRIVACY POLICY

Rose Associates, Inc. ("Company", "we", or "us") is committed to protecting consumer privacy. We understand that users of our website ("Site") are concerned about their confidentiality and privacy, and we take commercially reasonable steps to ensure that any personal information you give to us is handled in a safe and responsible manner. This Privacy Policy was developed and continues to be monitored and updated to effectively communicate the privacy practices of the Company and our continuing commitment to safeguard the information we collect about you during your use of the Site.

You are protected by various state and federal laws with respect to consumer privacy, including, without limitation, Section 5 of the Federal Trade Commission Act, which prohibits unfair and deceptive practices and the Fair Credit Reporting Act (FCRA), as amended by the Fair and Accurate Credit Transactions Act of 2003 (FACTA), which promotes accuracy in consumer reports and ensures the privacy of information contained therein.

It is important to remember that by using the Site, you acknowledge and agree to the terms of this Privacy Policy. We suggest that you refer to this Privacy Policy on a regular basis as it may change, at any time, in the Company's sole discretion, to account for technological advances, business changes or for any other practical or legal reasons associated with protecting consumer privacy.

INFORMATION THAT WE MAY COLLECT.

Application Information

We do not collect information about you unless you expressly instruct us to collect your information as part of a lease application process. This information may include, without limitation, name, social security number, address, phone number, rental history, employer, bank information, financial status, and any other personal information generally required to complete a residential lease and credit application. (collectively, the "Application Information").

USE TRACKING

In the course of using the Site, we may also automatically track certain information about you. This information may include the URL of the website you visited prior to our Site (whether this URL is on the Site or not), which URL you visit after this Site (whether this URL is on the Site or not), what browser you are using, and your Internet Protocol (IP) address. Many sites automatically collect this information. We do not collect or use this information to create a profile about you. We may also decide to use cookies on certain pages of the

Site. Cookies can help us provide information which is targeted to your interests. Cookies are stored on your hard drive, not on the Site. Most cookies are "session cookies," meaning that they are automatically deleted at the end of a session (collectively the URL tracking and cookies, the "Site Use Information") Our Use of Your Information.

The Application Information you provide to us is used solely for the purpose of requesting a credit report and making an evaluation of your lease application. Only third-party credit reporting service providers, employees, brokers and other authorized personnel on a need-to-know basis have access to the Application Information and such access is only for purposes of conducting a fair evaluation of your lease application. We use On-Site Manager, Inc. (www.on-site.com) to assist in obtaining credit reports in connection with your lease application and for other management purposes with respect to our properties. The use of your Application Information provided to On-Site Manager, Inc. for purposes of the credit application is subject to the policies of On-Site Manager, Inc. The Company shall not be responsible for any use of such Application Information by On-Site Manager, Inc. based on their privacy policies. You may contact On-Site Manager, Inc. directly should you have specific questions regarding their policies. We and/or On-Site Manager, Inc. may contact any individual(s) or organization(s) contained in your lease application solely for purposes of verifying the information you provide to us and you authorize us to do so by completing our lease application.

We internally use the Site Use Information to improve our services, to statistically analyze website usage, to improve our content, to customize the Site's content and layout and for other customer service purposes. We believe these uses allow us to improve the Site and better tailor it to meet our users' needs.

We do not sell, lend or rent any personally identifiable information about you to any third parties outside of the Company, its parent, affiliates, subsidiaries, authorized agents and service providers, operating companies and other related entities.

We may also disclose or use personally identifiable information to investigate and respond to any violations of the Site's Terms of Use. We can (and you authorize us to) disclose any information about you as required by law, including voluntary disclosures to law enforcement agencies and government officials, as we, in our sole discretion, believe necessary or appropriate.

Unfortunately, due to the existing regulatory environment, we cannot ensure that all of your private communications and other personally identifiable information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), third parties may unlawfully intercept or access files,

transmissions or private communications. Therefore, although we use industry standard practices to protect personally identifiable information, we do not promise, and you should not expect, that your personally identifiable information or private communications will always remain private.

DISPOSAL OF INFORMATION

Pursuant to the requirements of the Disposal Rule, a part of the Fair and Accurate Credit Transactions Act of 2003 (FACTA), the Company will use reasonable and appropriate measures to prevent the unauthorized access to - or use of - the Application Information you provide to us. This may include the physical destruction of files containing your Application Information and the destruction of electronic files or media containing your Application Information. The Company uses commercially reasonable measures, in its discretion, to properly dispose of your Application Information.

THIRD PARTY COLLECTORS OF INFORMATION.

Our Privacy Policy only addresses the use and disclosure of information we collect from you. To the extent that your information is disclosed by you to third parties, whether through brokers, our clients, service providers, advertisers or other sites throughout the Internet, different rules may apply to their use or disclosure of your information. These third parties adhere to their own privacy customs and policies. Because we do not control the privacy policies of third parties, you are subject to the privacy customs and policies of that third party.

We do not make any representations or warranties as to how such third parties may use your information.

ADVERSE ACTION

The Company will notify you and/or your broker of any unfavorable action taken with respect to your lease application (whether based entirely or partly on the credit report provided by On-Site Manager, Inc.) ("Adverse Action"). In the event any Adverse Action is taken based solely or partly on the credit report provided by On-Site Manager, Inc., we will notify you and provide you with additional information with respect to the source of the credit report and contact information.