

DETROIT HOUSING NETWORK

Website Privacy Policy

LAST UPDATE: [DECEMBER 14, 2022]

Detroit Housing Network (“DHN”) is a network of housing service providers (each, a “Network Member” “licensee”, “intake partner”, or “referral partner”), led by CHN Housing Partners, the “Network Manager” (“CHN”, and together with DHN, “we”, “our”, and “us”), whose mission is to create healthy neighborhoods and advance racial equity in the City of Detroit by increasing housing stability and affordable home ownership for Detroit residents. We respect your concerns about privacy and personal data protection and value our relationship with you. This Website Privacy Policy (the “Policy”) applies solely to personal information collected through the DHN website and any other online services, applications, and web pages that post, specifically reference, and incorporate this Policy (all of the foregoing, collectively, the “Site”), whether accessed via computer, mobile device or other device (collectively, “Device”).

This Policy describes the types of personal information we collect through the Site and how that personal information may be used and/or with whom it may be shared. This Policy also describes how you can reach us to update your personal information, access and control the use of the personal information, or get answers to questions you may have about our privacy practices at this Site. Please read this Policy carefully, because by accessing and using this Site you are acknowledging that you understand and agree to the terms of this Policy.

1. COLLECTION AND USE OF PERSONAL INFORMATION

As you interact with us, there may be opportunities for you to provide us with your information. Additionally, we may collect certain information about you as further described below.

You may provide us with information about you through a number of sources: our websites, applications, forms, events, surveys, social media platforms, email, phone, and through our contact centers.

The categories of information that we collect about you may include, but are not limited to:

- Identifiers/Contact information (such as name, address, city, state and ZIP code, email address, telephone number, unique personal identifier, online identifier, IP address, Social Security number, driver’s license number, passport number, or other similar identifiers)
- Demographic information (such as gender, date of birth, marital status, education, income, and household composition)
- Professional or employment related information (such as current or past job history)
- Information about your connected devices (such as mobile phone, computer, or tablet) and how you interact with our products, services, apps, and websites (such as IP address, browser type, unique device identifier, cookie data, and associated identifying and usage information)
- Marketing profile information
- Inferences drawn from other personal information (such as personal preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes)

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you as described herein;
- Indirectly from your activity on this Site;
- From third parties that interact with us in connection with the services we provide, including, without limitation, Network Members, licensees, intake partners, and referral partners.

The information we collect about you and your devices may be used:

- To provide services and maintain our relationship with you
- To improve the quality, safety, and security of our services
- To operate our websites and applications, including online registration processes
- To autofill data fields on our websites or applications to improve your online experience
- To develop new services
- To provide support and service
- To provide information and updates related to our services
- For research, evaluation of use, and troubleshooting purposes
- For marketing and analytics purposes
- To customize and improve communication content
- To comply with legal, regulatory, or contractual requirements

Communications with you in connection with these uses may be via mail, telephone, e-mail, text message, social media, or other electronic messages, or via our websites and applications.

You will be informed what personal information is required and what information is optional when asked to submit personal information to us. By submitting personal information to us at this Site, you hereby consent to our collection, use and disclosure of such personal information for the purposes set forth in this Policy.

We may combine the personal information you submit directly through this Site with other personal information we have collected from you, whether on- or offline. We may also combine it with information we receive about you from other sources, such as other companies, publicly available information sources (including information from your publicly available social media profiles), and other third parties.

Passive Information Collection and Use

As you navigate around this Site, certain information can be passively collected (that is, gathered without you actively providing the information), using various technologies. We passively collect and use information in a variety of ways, including:

- Through your browser and Device: Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version,

and Internet browser type and version. We collect Device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). We may associate your device identifiers or phone number with your DHN account.

- **Cookies:** Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to collect information such as browser type, time spent on this Site, pages visited, and language preferences. We and our service providers use the information for security purposes, to facilitate navigation, and display information more effectively. In addition, we use cookies to gather statistical information about Site usage in order to continually improve its design and functionality, understand how individuals use it, and to assist us with resolving questions regarding it.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. If you set your browser to reject cookies, part of the Site may not work for you.

- **Pixel tags, web beacons, clear GIFs, or other similar technologies:** These may be used in connection with some Site pages to, among other things, track the actions of Site users and compile statistics about Site usage and response rates.
- **IP Address:** Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits this Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many web sites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering this Site.
- **Do Not Track Requests:** Your selection of the “Do Not Track” option provided by your browser may not have any effect on our collection of cookie information for analytic and internal purposes. The only way to completely opt out of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or Device to delete and disable cookies and other tracking/recording tools. Please note, depending on your type of Device or browser, it may not be possible to delete or disable all tracking mechanisms on your Device.

We may permit third-party advertising partners to use the foregoing tracking technologies to collect information about your browsing activities over time and across different websites when you use the Site. For example, we may use advertising services provided by third-party ad partners, such as Google, to market our service to you on other websites and online services. Through a process called “retargeting,” each service places a cookie on your browser when you visit the Site so that they can identify you and serve you ads on other sites around the web based on your browsing activity. To avoid use of this information for advertising by these third-party ad partners, you can change your browser settings to reject cookies or to notify you when cookies are set and you could select the Do Not Track option on your browser, though we have no control over and cannot confirm whether these third-party ad partners honor the Do Not Track browser signal. Additionally, many advertising companies are members of the NAI or DAA and/or provide opt-outs on those industry pages at networkadvertising.org/choices or aboutads.info/choices.

We may utilize Google Analytics on the Site. Google Analytics is a website analysis service provided by Google, Inc. (“Google”). Google utilizes the data collected to track and examine the use of this Site, to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. For more information on Google’s Privacy Policy go to <https://www.google.com/intl/en/policies/privacy/>. Users can opt-out of Google Analytics tracking at <https://tools.google.com/dlpage/gaoptout/>. Some additional Google Analytics features that we use may include:

- Google Analytics Demographics and Interest Reporting – allows us to see the age, gender and interests of website visitors to better understand them and personalize advertising.
- Google Display Network Impression Reporting – for banner ads.
- Google Tag Manager – a tag management system.
- Remarketing through Google Analytics for Display Advertising – allows personalization of ads on our ad networks.
- User ID Extension for Google Analytics – allows us to connect multiple devices, sessions and engagement data.

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website. Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

Integrated Accounts and Social Media Information

We may implement applications or "widgets" from third party providers (e.g., Facebook, Twitter, Instagram, LinkedIn, etc.) that allow interaction, integration or content sharing with third party services. These widgets or applications may be visible on a page you visit on our Site or may require log-in through the third party provider's service. The third party providing the widget or integration may offer controls for you to manage your interactions. Any interaction with a third party widget or application typically allows the third party to collect some information about you (whether through cookies, registration information or otherwise). These third parties may even track you when you do not interact with the widget. If you have engaged any of these third party service providers, their respective privacy policies will govern their tracking and collection of information. You should review these third party policies to understand these practices.

How We Use and Disclose Information

We may disclose personal information that we collect or you provide as described in this Policy. The information may be disclosed for a business purpose to the following categories of third parties:

- To Network Members, licensees, intake partners, and referral partners to facilitate the provision of housing services to individuals and families in the City of Detroit.
- To contractors, service providers and other third parties we use to support our business.
- To third parties to market their products or services to you, if you have consented to these disclosures.
- To our affiliates for related business purposes.

We also use and transfer personal information from or about you:

- to facilitate the provision of housing services to you by Network Members, licensees, intake partners, and referral partners;
- to respond to your inquiries and fulfill your requests, such as to send you documents you request or e-mail;
- to send you important information regarding our relationship with you or regarding this Site, changes to our terms, conditions, and policies and/or other administrative information;

- for our business purposes, such as marketing new services, data analysis, audits, developing new services, enhancing our Site, improving our services, identifying Site usage trends, and determining the effectiveness of our Site;
- to our third party service providers who provide services such as website hosting and moderating, mobile application hosting, data analysis, infrastructure provision, IT services, e-mail services, marketing services, auditing services, and other services, in order to enable them to provide services;
- to verify your information and approve your registration as a user of the Site;
- to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings); and
- when we otherwise have your consent.

In addition, we use and disclose personal information collected through this Site as we believe to be necessary or appropriate: (a) as permitted by applicable law, including laws outside your country of residence; (b) to comply with any legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our Terms of Use; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. We may also use and disclose personal information collected through this Site in other ways, with your prior consent.

We also use and disclose information we collect passively as described above, under "Passive Information Collection and Use," and for any other purpose, except where we are required to do otherwise under applicable law (for example, if we are required to treat such information as personal information). In addition, we may use and disclose information that is not in personally identifiable form (such as anonymized, masked or de-identified information) for any purpose. If we combine information that is not in personally identifiable form with information that is (such as combining your name with your geographical location), we will treat the combined information as personal information as long as it is combined.

Use of Information for Marketing Purposes

We may send you regular promotional communications about our services and events. Such promotional materials may use the "DHN" or "CHN" brand and may be sent to you via different channels, such as: email, phone, SMS text messages, postal mailings, and third party social networks.

In order to provide you with the best personalized experience, sometimes these communications may be tailored to your preferences (for example, as you indicate these to us, as we may have inferred from your Site visits, or based on the links you click in our emails). When required by applicable law, we will obtain your consent before starting these activities. In addition, you may withdraw your consent (opt-out) at any time.

In particular, you can opt-out from receiving marketing-related emails by following the unsubscribe instructions provided in each email. You can also contact us using the contact details provided below to opt-out from receiving marketing-related communications.

Please note that even if you opt-out from receiving marketing communications, you might still receive administrative communications from us.

2. GENERAL PRINCIPLES FOR THE PROCESSING OF PERSONAL INFORMATION

Personal information will be collected, stored, processed and transmitted in accordance with our established policies and applicable federal, state, local and foreign laws, rules and regulations.

Our principles with respect to the processing of personal information are as follows: (1) personal information will be processed fairly and lawfully, (2) personal information will be collected for specified, explicit, and legitimate purposes and not further processed for incompatible purposes, (3) personal information we collect will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and processed, (4) personal information we collect will be accurate and, where necessary, kept up to date to the best of our ability, (5) personal information we collect will be retained as identifiable data for no longer than necessary to serve the purposes for which the personal information was collected, and (6) personal data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

If we engage in the processing of personal information for purposes other than those specified in this Policy, we will provide notice of these changes, the purposes for which the personal information will be used, and the recipients of personal information.

3. CONSENT

Consent to Data Collection and Processing

You hereby agree with and consent to the collection and processing of your personal information as described in this Policy.

Consent to International Data Transfers

We and our service providers may collect, process, and store your personal information in the United States and other countries where our servers reside, and you hereby agree with and consent to the transfer of your personal data to such countries. Please be aware that the privacy protections and legal requirements, including the rights of authorities to access your personal information, in some of these countries may not be equivalent to those in your country.

Withdrawal of Consent

You have the right, at any time, to withdraw your consent to our collection and processing of your information, or to the transfer of your personal data to the countries where we and our service providers operate. You may withdraw your consent by emailing us at legaldepartment@chnhousingpartners.org. Withdrawal of consent may impact the ability for you to continue to access or receive services through this Site.

4. THIRD PARTY SITES AND SERVICES

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or web property (including, without limitation, any application) that is available through this Site or to which this Site contains a link. The availability of, or inclusion of a link to, any such site or property on this Site does not imply endorsement of it by us or by our affiliates.

Third parties, including, without limitation, Network Members, licensees, intake partners, and referral partners, may offer services on the Sites and collect information about you by requesting certain information necessary to provide a particular service. We may also obtain certain information about our users from third party customer research groups (e.g., demographic information) which we use to learn more about the populations we serve. We do not control the policies and practices of third parties in relation to the use and disclosure of any information about users collected by

third parties on the Site or in market research programs conducted by such third parties and any use or disclosure of such information by third parties is not governed by this Policy.

5. CHOICES AND ACCESS

We give you choices regarding our use and disclosure of your personal information. We provide you with the opportunity to receive information by email, regular mail or telephone calls from us, or third parties which may be of interest to you, including information relating to new services offered on the Site by DHN, or other third parties, including Network Members, licensees, intake partners, and referral partners. If you do not want to receive any information by email, regular mail or telephone calls, you may opt-out of further communications provided by us at any time by: (i) sending us an email at legaldepartment@chnhousingpartners.org; or (ii) writing to us at CHN Housing Partners, Legal Department, 2999 Payne Avenue, Suite 134, Cleveland, Ohio 44114. Please note that we can only comply with requests relating to email, regular mail or telephone communications provided by us. If you no longer wish to receive further information by email, regular mail or telephone from any third party, you will need to contact such third party directly to opt-out of further communications being provided to you. We will seek to comply with your request(s) as soon as reasonably practicable.

If applicable, and you would like to review, correct, update, or delete the personal information that you have provided via this Site, please contact us. We will try to comply with your request as soon as reasonably practicable.

6. ACCURACY

It is your responsibility to provide us with accurate personal information. Except as otherwise set forth in this Policy, we shall only use personal information in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. To the extent necessary for these purposes, we will take reasonable steps to ensure that personal information is accurate, complete, current and relevant to its intended use.

7. YOUR RIGHTS OVER YOUR INFORMATION

By law, you have a number of important rights. In summary, these include the following rights to:

- fair processing of your personal data and transparency over how we use your personal data;
- access to your personal data and to certain other supplementary information that this privacy policy is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal data concerning you, in certain situations;
- receive the personal data concerning you that you have provided to us, in a structured, commonly used and machine readable format, and have the right to transmit that data to a third party, in certain situations;
- object at any time to processing of personal data concerning you for direct marketing;
- object to decisions being taken by automated means that produce legal effects concerning you or similarly significantly affect you; and
- object in certain other situations to our continued processing of your personal data.

If you would like to exercise any of these rights, please email, call, or write to us with the following: (1) enough information to identify you; (2) proof of your identity and address; and (3) the information to which your request relates.

8. RETENTION PERIOD

We retain your personal information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or allowed by law or to otherwise fulfill a legal obligation.

9. SECURITY

We have implemented security measures designed to protect personal information provided by you against unauthorized access and use. We also use commercially reasonable efforts to establish secure connections with your web browser for any transactions conducted online using a credit card or other financial information you may provide to us. Please be aware, however, that no data transmission over the Internet is 100% secure and any information disclosed online can potentially be collected and used by parties other than the intended recipient. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the CONTACTING US section below.

10. USE OF SITE BY MINORS

We do not intentionally collect information from individuals under the age of 13. The Site is not directed to individuals under the age of 13 and we request that these individuals not provide personal information through this Site.

11. COMPLIANCE WITH LOCAL LAWS

This Policy is meant to guide us with respect to personal information collected from or about you at this Site. While this Policy applies to personal information generally, the local laws, rules and regulations of jurisdictions that are applicable to us (“Local Laws”) may require standards which are stricter than this Policy and, in such event, we will comply with applicable Local Laws. Specific privacy policies may be adopted to address the specific privacy requirements of particular jurisdictions. All the information you provide may be transferred or accessed by entities around the world as described in this Policy. Your personal information may be stored and processed in any country where we have facilities or service providers, and by using our Site or by providing consent to us (where required by law), you specifically acknowledge and consent to the transfer of information to countries outside of your country of residence, including to the United States, which may provide for different data protection rules, and a lower standard of required protection, than in your country. Irrespective of which country your personal data is transferred to, we would only share your personal data under a ‘need to know’ basis. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by organizational, technical, contractual and/or other lawful means.

12. UPDATES TO THIS PRIVACY POLICY

We may change this Policy. Please review the LAST UPDATE legend at the top of this Policy to see when it was last revised. Any changes to this Policy will become effective when we post the revised Policy on this Site. Your use of this Site following these changes means that you accept the revised Policy.

13. COMPLIANCE

We will use a self-assessment approach to verify compliance with this Policy and periodically verify that the Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, implemented and accessible.

If you believe that your personal information has been processed or disclosed in violation of this Policy, we encourage you to raise any concerns using the contact information provided in this Policy. We will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information.

14. YOUR RIGHT TO COMPLAIN

If you have a complaint as to our use of your information, you may file a complaint with us, any governmental agency, and/or a judicial body.

A complaint may be submitted directly to us:

- In writing by sending an email to: legaldepartment@chnhousingpartners.org;
- In writing by sending a letter to CHN Housing Partners, Legal Department, 2999 Payne Avenue, Suite 134, Cleveland, Ohio 44114; or
- Orally by directly contacting 216-574-7100.

15. CONTACTING US

If you have any questions about this Policy, please contact CHN directly.

CHN's contact information is as follows:

CHN Housing Partners
Legal Department
2999 Payne Avenue, Suite 134
Cleveland, Ohio 44114

217-574-7100 (Monday to Friday, 8:30am – 5pm EST)
legaldepartment@chnhousingpartners.org