

Please read this Privacy Policy, as well as our Terms and Conditions of Use, carefully and in their entirety before using this website and its contents.

Nyanda & Associates, LLC, a California Limited Liability Company d/b/a HouseKeys (“HouseKeys”, “Company”, “we”, “our”, or “us”) collects from you, including through this website and as part of HouseKeys’ normal operations. This Privacy Policy and our Terms and Conditions of Use describes what may happen to that information.

By accessing this website, downloading or using materials from this website and/or uploading or sending materials or information to this website, you agree to abide by this Privacy Policy and the Terms and Conditions of Use. If you do not agree to this Privacy Policy and the Terms and Conditions of Use, then you should not use this website. We reserve the right to make changes, at any time without notice, to the website and its contents, including this Privacy Policy and the Terms and Conditions of Use. Each time you visit the website you should check the contents and this Privacy Policy as well as the Terms and Conditions of Use for any updates or revisions. You agree to be bound by any such revisions and updates.

Any disputes relating to this Privacy Policy or Company’s handling of your information are subject to this Privacy Policy as well as this website’s Terms and Conditions of Use, including a mandatory arbitration provision. Please review the Terms and Conditions of Use carefully.

WHAT WE COLLECT

What personal information we collect depends on what you do when you use the Site and on what personal information you elect to give us, but it may include your name, email address, phone number, and characteristics of your household. This personal information is only collected if you voluntarily provide it to us while answering questions to determine your eligibility as an applicant to the programs that administered by HouseKeys. If you select the option to be contacted for more details, any third parties receiving your request will only receive the contact information you provide and the programs for which HouseKeys has determined you may be eligible. In addition, this information may be used to provide offers to you. We aggregate data we collect for various purposes including the improvement of the operation of our Site.

We may use Google Analytics and other similar third-party services to collect and analyze data on usage of the Site, including individuals’ usage patterns over multiple visits. These services may involve storage of information on your computer in cookies, as well as transmission and storage of information about each page you view on the Site to third parties’ servers in the United States. Information transmitted to these services includes anonymous, non-personal data, such as your Internet address and attributes of your browser and computer, and may also include personal information, such as your name, email address and household characteristics, to the extent that you provide it to us. Such information stored on third party servers is available only to us for purposes of analyzing and reporting on usage of the Site. It is not available to the service providers for any other purpose, and is not associated with any other information that the service providers may have about users of the Site. You may prevent some of this data collection by disabling cookies, but please note that in doing so you may not be able to use the full functionality of the Site. Additionally, plug-ins are available for certain web browsers to prevent collection of information

by Google Analytics. Visit <https://tools.google.com/dlpage/gaoptout> for more information about downloading and installing these plug-ins. By using the Site, you consent to the collection, storage and analysis of data about you in the manner and for the purposes set out above.

DO NOT TRACK

As discussed above, because we may track Site usage information through the use of cookies, pixels and other tracking mechanisms, your selection of the “Do Not Track” option provided by your browser may not have any effect on our collection of cookie information. 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 to delete and disable cookies and other tracking/recording tools. However, getting a “Do Not Track” signal to work as you might want is difficult. Using browsers as an example, not all tracking technologies can be controlled by browsers; unique aspects of your browser might be recognizable even if you disable a tracking technology; not all settings will necessarily last or be effective; even if a setting is effective for one purpose, data still may be collected for another; and even if one website observes a “Do Not Track” signal, that website usually will not be able to control other websites.

PERSONAL INFORMATION

If you wish, you can provide us with personal information about yourself by using the contact forms and email addresses on the Site. This information includes your name, address, email address and phone number. We only collect this information directly from you and only when you elect to provide it. Personal information about you is only used to conduct business with you. If you desire at any time that we no longer contact you based on information you have provided to us, you can contact us at the contact points specified below and request that you no longer be contacted, and we will make commercially reasonable efforts to timely fulfill that request.

HOW WE USE YOUR INFORMATION AND WHAT INFORMATION WE MAY SHARE

We use information that we collect about you or that you provide to us, including any personal information: (i) To present the Site and its contents to you; (ii) To provide you with information, products or services that you request from us; (iii) To fulfill any other purpose for which you provide it, including providing services to assist you in the pursuit of obtaining financial and lending information; (iv) To carry out our obligations and enforce our rights arising from any contracts entered into between you and us; (v) To notify you about changes to the Site or any products or services we offer or provide through it; (vi) To allow you to participate in interactive features on the Site; (vii) In any other way we may describe when you provide the information; and for any other purpose with your consent.

We may also use your information to contact you about our own and third parties’ goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data (the registration form). We may use the information we have collected from you to enable us to display advertisements to our advertisers’ target audiences. Even though we do not disclose your personal

information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

We may disclose your personal information if required to do so by law or in the good-faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on HouseKeys or its web sites; (b) protect and defend the rights or property of HouseKeys or (c) act to protect the personal safety of the employees of HouseKeys and other users of the Site. We take commercially reasonable steps to ensure the security of the Site and the information we collect about you.

Some of our services involve referral of your inquiry to third parties, such as non-profit debt counselors. If you elect to use services involving such referrals, you agree that information submitted by you to us including on this website will be shared, either directly or through intermediary entities, with one or more third parties. Please carefully consider that third parties may retain or use personal information even if you do not use their services and you should contact the third parties directly concerning their privacy policies, which may differ from this Privacy Policy.

By registering on this Website, you may also receive commercial email and/or telemarketing calls in response to your inquiry from us or third-parties who receive your information as provided in this Privacy Policy. If you provide your express consent to receive calls or text, you may receive telemarketing calls or text messages at the phone number provided regarding the products and/or services for which you have expressed an interest.

You expressly acknowledge that we may provide your information to third parties for promotional offers by email, telephone, mobile device and/or SMS text (including, with your lawful prior express written consent, by automated telephone dialing and/or artificial pre-recorded voice) at the number provided. We have captured information to prove prior written consent was obtained from you, via an electronic signature.

Specifically, we may have captured an IP Address, website pages which contain the consent language and fields, associated screenshots of the consent webpage as seen by you where your telephone number was entered, complete data record submitted by you (with time and date stamp), or other identification sources. All collected information will be retained by us for a period of time as determined by us, which could be four years or longer. Separate lists may be maintained for different purposes. If you wish to end your inclusion in a particular list, you need only to follow the instructions at the end of each communication to unsubscribe from the particular list.

By submitting your personal information to us, you agree that such act constitutes an inquiry for purposes of the Amended Telemarketing Sales Rule (16 C.F.R. § 310 et seq.), as amended from time to time (the “ATSR”) and applicable state do not call regulations. As such, notwithstanding that your telephone number may be listed on the Federal Trade Commission’s Do-Not-Call List, and/or on applicable state do-not call lists, we and/or third-parties receiving your information as provided herein retain the right to contact you via telemarketing in accordance with the ATSR and applicable state do-not-call regulations.

Where you provide “prior express written consent” within the meaning of the Telephone Consumer Protection Act (47 U.S.C. § 227), and its implementing regulations adopted by the Federal Communications Commission (47 C.F.R. § 64.1200), as amended from time to time (the “TCPA”), you consent to receive telephone calls, including artificial voice calls, pre-recorded messages and/or calls (including SMS text messages) delivered via automatic telephone dialing system, to the telephone number(s) that you provided. You are not required to consent to such telemarketing as a condition of purchasing any property, goods or services; you may revoke such consent at any time. Standard text message rates will apply.

PLEASE BE ADVISED THAT BY AGREEING TO THIS PRIVACY POLICY, YOU ARE OBLIGATED TO IMMEDIATELY INFORM US IF AND WHEN THE TELEPHONE NUMBER ASSOCIATED WITH YOUR MOBILE DEVICE(S) HAS/HAVE CHANGED.

We are not responsible for third-party promotional communications sent to you. We provide you the opportunity to “opt-out” of having your information used for certain purposes. You may remove your information from our database by contacting us directly. If you remove your information from our database it will no longer be disclosed to third-parties or used by us to send promotional communications to you. However, we may retain information necessary to establish your lawful consent to receive marketing messages, and third parties may retain information they have received from us.

LOG FILES

As is common for most server technologies, our web servers produce log files that may contain details of each interaction between your browser and the Site. This includes Internet Protocol (IP) addresses, browser identification strings, URLs of pages and related assets that are requested, data submitted through forms on the Site, and timestamps. These log files are stored locally on our servers, are available only to us, and are used only for diagnostic and troubleshooting purposes. We take commercially reasonable steps to secure these files against access by unauthorized parties.

CHILDREN’S PRIVACY

We believe that protecting the privacy of children is very important. The Site is not designed to attract individuals under the age of 18. In accordance with the Children’s Online Privacy Protection Act (COPPA), we do not collect or store any personal information, even in aggregate, about children under the age of 13. If we discover we have received any information from a child under the age of 13 in violation of this policy, we will delete that information immediately. If you believe that HouseKeys has any information from or about anyone under the age of 13, please contact us at the contact points specified below.

LINKED SITES

The Site may contain links to various other web sites. HouseKeys assumes no responsibility for the content or practices of web sites linked through the Site and such linking should not suggest or imply any affiliation or endorsement by HouseKeys of the linked web site. Please be aware that we, HouseKeys, are not responsible for the privacy practices of such other sites. We encourage

our users to be aware when they leave our site and to read the privacy statements of each and every site that collects personally identifiable information. This privacy statement applies solely to information collected by the Site as defined in the first paragraph above.

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed personal information (as defined under that statute) of that California resident, for direct marketing purposes in the preceding calendar year and the categories of personal information that was disclosed to them. If you are a California resident and you wish to make such a request, you may contact us by electronic mail at programs@housekeys.org

We may provide you the ability to post information on the Site. If you are a California resident who is under 18 and a registered user of the Site and you are unable to remove content or information you posted in a public area of the Site by following the instructions provided on the Site, you may request removal by contacting us at programs@housekeys.org. When requesting removal please be specific about the information or content you want removed and provide the URL for each page on the Site where it is located. We are not required to remove any content or information that: (a) federal or state law requires us or a third party to maintain the content or information; (b) the content or information was not posted by you, the registered user; (c) we anonymize the content or information so that you cannot be identified; (d) you don't follow our instructions for removing or requesting removal; or (e) you received compensation or other consideration for providing the content or information.

REMOVAL OF YOUR POSTED CONTENT OR INFORMATION FROM THE SITE DOES NOT ENSURE COMPLETE OR COMPREHENSIVE REMOVAL OF THAT CONTENT OR INFORMATION FROM OUR SYSTEMS OR THE SYSTEMS OF OUR SERVICE PROVIDERS.

We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public. Also, some content and information you post that has been copied or reposted by a third party is outside of our control and will not be removed.

SECURITY

We attempt to implement commercially reasonable efforts to safeguard all of the information that we collect. However, no computer system can ever be made 100% secure. To the extent required by applicable federal and state laws, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your personal information. Third-parties who receive your information are obligated by contract and/or applicable law to also protect your personal information. However, we are not responsible for the conduct of the third parties and do not warrant or guarantee the quality of their efforts, if any, to protect your information. If users have any questions about the security of the Site, users can contact us at the contact points specified below.

CORRECTING/UPDATING/DELETING/DEACTIVATING PERSONAL INFORMATION

If your personally identifiable information changes (such as zip code, phone, email or postal address) you may correct, update or delete/deactivate your personally identifiable information by contacting us at the contact points specified below.

REVISIONS TO THIS POLICY

HouseKeys reserves the right to periodically revise this policy. Please check this page periodically for changes. The document revision date displayed above at the beginning of the document indicates when this policy was last revised.

CONTACT INFORMATION

To contact HouseKeys regarding the Site, please call us at: 877-460-5397, or send an e-mail to: programs@housekeys.org.