



Privacy Policy

Jennings Group, Incorporated (referred to herein as 'Jennings Group, Inc.' 'we,' 'us,' or 'our' herein) recognizes the importance of protecting the privacy of individual-specific information ('Information') collected about our tenants and prospective tenants (referred to as 'Customers,' 'you' or 'your'). This Privacy Policy effective September 1, 2013 discloses how we gather information, what information we gather, how we use it, and how you can correct or change it. It is our intention to give you as much control over your personal data as possible to preserve your privacy, while still allowing us to utilize that Information in the course of our business to provide you a valuable service and hopefully to have you as a new resident of our facility.

When do we collect information?

We may collect information about you anytime you interact with Jennings Group, Inc. such as when you (i) access or browse our website, (ii) transact business with us, (iii) communicate with us either by e-mail, over the telephone or in any other manner, (iv) fill out any applications, forms or surveys available on our website or our leasing offices, (v) request information about our facilities.

What information do we collect?

Information we collect is generally of two types– personally identifiable information and non-personally identifiable information.

Personally identifiable information comprises any information that can help us identify or locate an individual, including, without limitation, an individual's name, address, e-mail address, telephone number, credit card number, social security number and financial information not publicly available.

Non-personally identifiable information comprises information that does not by itself identify an individual. This information generally includes anonymous information about an individual's use of our website that includes, among other things, information concerning date and time of visit, the pages of the website visited, path through the website, IP address, the type of browser and operating system used.

How do we collect your personal information? And why?

General

We do not collect personally identifiable information, except when you specifically and knowingly disclose such information. This information is generally collected when you fill out

forms or applications available online or at our offices, fill out surveys, enter promotional events or correspond with us. If you disclose your personal information, we will only store and use such information that we need to meet your requests and our legitimate business objectives.

Renting an accommodation

To rent an accommodation, we require you to fill in an application and provide us your first and last name, home or other physical address, your telephone number, your e-mail address or other personal contact information, credit card number, social security number or other non-public financial information. This application can be filled online on our website or at our leasing office. You may choose not to provide your personal information; however, you will not be able to rent an accommodation with us.

Background Checks

We will use personal information disclosed by you to conduct background checks. We may verify any information that you submit to us in connection with your application for a lease through any means, including any consumer or criminal record reporting agencies, personal and professional references, employers and other rental housing owners.

Online Surveys

In order to improve our facilities and services, we may use your personal information to send information about online surveys. These surveys help us to know more about your experience with our facilities and services. Your responses to these surveys are treated as confidential information. If you do not wish to participate in a survey, you may simply decline when asked. You may also choose to opt-out of participating in any future surveys. If you do so, we will not send you any survey requests in the future.

Updates and Promotional E-mails

We may use your personal information to send you updates and promotional e-mails periodically listing general tenant information, current specials, promotions and deals as a service to our existing tenants. We may also provide information about any social events that we plan to organize at our facilities. If you do not wish to receive such updates and e-mails, you may choose to opt-out by exercising the option provided during your account registration. If you have elected to receive these e-mails and wish to discontinue receiving in the future, please follow the opt-out instructions provided on the e-mails or log into your account on the website and follow the instructions to make the appropriate changes.

Correspondence

If you contact us by telephone, e-mail or letter to provide feedback, comments or inputs or for any other reason, we may keep a record of that correspondence and collect your personal information to process your enquiries, respond to your requests and improve our services.

Information Collection

Usage Tracking: Use of IP Addresses

An IP address is a number that is automatically assigned to your computer whenever you're surfing the Internet. Web servers, the main computers that serve up web pages, automatically identify your computer by its IP address. Jennings Group, Inc. collects IP addresses for the purposes of system administration, reporting aggregated information, and to audit the use of our site. When Customers request pages from the Jennings Group, Inc. site, our servers log the Customers' IP addresses. We do not normally link IP addresses to anything personally identifiable, which means that a Customer's session will be logged, but the Customer remains anonymous to us. We can and will use IP addresses to identify a Customer when we feel it is necessary to enforce compliance with our house rules or terms of service or to protect our service, site, customers or others from potential harm.

Use of 'Cookies'

Cookies are pieces of information that a website transfers to an individual for record-keeping purposes. Cookies make web surfing easier for you by saving your preferences while you are at our site. We never save passwords in cookies. The use of cookies is an industry standard, and as such, you'll find them at most major websites. By showing how and when Customers use a site, cookies help us see which areas are popular and which are not. Many improvements and updates to the site are based on such data as total number of visitors and pages viewed. This information is most easily tracked with cookies. We use the information from cookies only to provide services better tailored to our Customers' needs.

How do we share the information that we collect?

General

Personal information which we collect for a particular purpose will only be saved and used for that purpose, unless you have agreed to allow us to use it for some other purpose, as described in this Privacy Policy. We sometimes share non-personal information with third parties about our user base, but that information does not include any personally identifiable information. Except as set forth in this Privacy Policy, we do not trade, share, rent, sell or give away information concerning you to third parties.

Our Service Providers and Strategic Partners

We may disclose your personally identifiable information to our service providers and strategic partners. For instance, we will disclose your credit card information to our financial service providers and banks for processing. These third party service providers and partners will have access to personal information needed to perform their functions but may not use it for other purposes.

Enforcement

We may disclose your personally identifiable information or otherwise use such information to communicate with you if required or permitted to do so by law or in the good-faith belief that such action is necessary to: (i) conform to legal requirements or comply with legal process or any governmental request; (ii) protect and defend our rights or property; (iii) enforce our applicable *service agreements*; or (iv) *protect the personal safety or interests of our employees and consultants, other users of the website, or members of the public in urgent circumstances*. We may also disclose any of your personal information to law enforcement or other appropriate third parties in connection with criminal investigations, investigation of fraud, infringement of intellectual property rights, or other suspected illegal activities, or as otherwise may be required by applicable law, or, as we deem necessary in our sole discretion, in order to protect our legitimate legal and business interests.

Securing Information

Encryption

We have put in place encryption software, which fully encrypts or distorts all data you submit to us through the use of electronic forms ('Items'). This encryption will be processed at 128 bits, making it a difficult code to hack into without the appropriate decoding software. Your personal data is immediately encrypted as you send it to us, and we then decode the encrypted data and use the converted data to process the aforementioned Items. We also work very hard to ensure that our employees are aware of the sensitivity of the data submitted to us and that they handle it with care, being careful not to allow any improper access by third parties.

Because the security of all Information associated with our customers is of utmost concern to us, we periodically review and improve our security and privacy policies as necessary when new technology becomes available. We exercise great care in providing secure transmission of your Information from your PC to our servers. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100 percent secure. As a result, while we strive to protect your Information, Jennings Group, Inc. can't ensure or warrant the security of any information you transmit to us online, and you, therefore, do so at your own risk. Once we receive your transmission, we use industry standard efforts to safeguard the confidentiality of your Information, such as firewalls and Secure Socket Layers, and our encryption techniques, as well. It is important, however, to remember that, despite these state of the art precautions, 'perfect security' does not exist on the Internet.

Children's Privacy

The website complies with the Children's Online Privacy Protection Act and all other applicable laws and regulations protecting children's privacy on the Internet. The website is not directed to children under the age of 18 and we do not allow persons under 18 years of age to create user accounts. Therefore, except as may be required by law, the website does not knowingly collect, maintain, or disclose any personal information from children under the age of 18. If you are under the age of 18, please do not: (i) access or use the website, (ii) fill or attempt to fill any form on the website, or (iii) sign up for any service.

Integrity

During the online account registration process you can review, change or remove the information you have submitted. We aim to keep our information about you as accurate as possible and encourage you to promptly update your information if it changes. You may, at any time, access your information to update, modify or delete any inaccuracies by accessing your account through the website. You may also request us to remove your account information from our databases and we will try to remove as much information as possible. However, as we generally keep information related to past transactions for our records, we will not be able to completely remove your information.

Changes to Privacy Policy

We may change our policy at any time by posting a new version of it on the website. We encourage you to check the website regularly for information about revisions to this Privacy Policy. In the event that we change our Privacy Policy, such changes will affect all of the information we collect after any such change. If you object to the change to our Privacy Policy, then you must contact us in writing regarding your objection.

Acceptance of these Terms

By using the website or providing information to us you signify your agreement to our Privacy Policy. If you do not agree with this policy, please do not provide information to us or use the website. You may choose not to provide your information to us; however, you will not be able to rent an accommodation with us. In addition, your continued use of our services or website following the posting of changes to these terms will also signify your acceptance of those changes.

Questions and Comments

If you have any questions or comments about this Privacy Policy, you may contact us at (541) 683-2271.