

Privacy Policy

Updated: April 25, 2016

Predictive Risk Assessment, LLC dba Tenant Risk Assessment (“TRA”) has created this Privacy Policy to record and explain our commitment to privacy, and as an agreement with our customers and with other third parties about our data-handling procedures. This policy lists the types of potentially private data TRA collects, explains how we use and protect that data, and discloses our key procedures surrounding privacy. This Privacy Policy applies to all TRA services (collectively, the “Service”) and to its websites: www.tra-llc.com and its secure client portal.

- **THIS PRIVACY POLICY IS A BINDING AGREEMENT BETWEEN YOU AND TRA.**
It forms part of a larger agreement between TRA and its customers, website visitors, and other users, consisting of the Terms of Service provided at www.tra-llc.com, as well as the other documents referenced in the Terms of Service. Your use of the Service and of TRA’s website is voluntary; if you do not agree with the terms of this Privacy Policy, you should not provide us with any personal information, and you should leave the TRA website. By using our website or the Service, you signify that you agree with the terms of this Privacy Policy. We may change this Privacy Policy from time to time by posting a new version here (with a new Effective Date at the top), and the new version will become effective immediately.
- The privacy of TRA’s customers and affiliates is very important to us, therefore: TRA does not sell or rent personally identifiable information.

TRA does not spam, and its policies forbid use of the Service for spam.

TRA automatically receives and records information from your computer and browser, including your IP address, TRA cookie information, software and hardware attributes, and the page you request. TRA uses information for the following general purposes: to customize the content you see, fulfill your requests for products and services, improve our services, contact you, conduct research, and provide anonymous reporting for internal and external clients.

Data TRA Collects

A. TRA collects and uses data from our customers, and from visitors to our website, as follows:

1. **Visitor Number Tracking:** TRA tracks the number of visitors to TRA’s website, as well as the pages they visit within the sites and the hyper-links they use (if any) to leave. This doesn’t involve collection of any personally identifiable information. We use this information to analyze interest in and usage of the website and the Service.
2. **Browsing Information:** TRA automatically receives and records information from your computer and browser, including your IP address, software and hardware attributes, and the page you request. We use this information for the following general purposes: to improve our services, contact you, and conduct research.

3. **Cookies:** Cookies are pieces of information that a web site transfers to a user's hard drive for record-keeping purposes while visiting a site. Like most web sites, TRA uses cookies on certain pages of our Site. Cookies make using the Internet easier by, among other things, saving your passwords and preferences for you. TRA may also use cookies to deliver content specific to your interests, and for other purposes. TRA's cookies do not contain any personally identifying information.
4. **Data Provided Through Inquiry Forms:** Website visitors interested in the Service can fill out a sales inquiry form at the site. Those forms request company name, individual name, title, address, telephone number(s), and email address(es), as well as technical and business information related to the Service. TRA uses this information to contact the potential customer and to discuss Service parameters. We also use the information to generate statistics regarding interest in the Service. We might share these statistics with third parties, but they don't include any personally identifiable information.
5. **Customer Account Information:** When customers sign up for the Service, and during their Service relationship, we collect some or all of the following: company name, individual name, title, address, telephone number(s), email address(es), credit card number, and choice of service package. We also record and retain most written communications with customers, including trouble tickets, support requests, and payment history. TRA uses this information for customer support. We also use contact information to send customers Service-related announcements, including newsletters and notices of new Service features and related products and services provided by TRA partners. Customers can opt out of new product/service notices by sending an email to info@tra-llc.com, or by following the unsubscribe instructions at the bottom of any one of the email notices. (However, current customers may not opt out of necessary Service or account maintenance notices.) Finally, we generate statistical information regarding our customer-base and use it to analyze our business. We might share this statistical information with third parties, but it doesn't include any personally identifiable information.

B. TRA also sometimes: (1) tracks the IP addresses of computers communicating (via e-mail or any other mechanism) with our customers' systems; and (2) inspects data packets solely for the purpose of trending and archiving specific threat types. Data described in the preceding sentence may include personally identifiable information, including information belonging to our customers' own customers and their website visitors. TRA uses this data solely to maintain the security of the Service.

Hosted Data

A. Through the Service, TRA provides computing and network infrastructure that hosts Internet communications and other applications. As a result, our infrastructure stores and transmits information about customers' businesses, as well as information collected by those businesses. We refer to all such information that we do not actively collect as "Hosted Data." Hosted Data may include personally identifiable information and other information that belongs to our customers' own customers, website visitors, or other users.

B. TRA is a passive recipient of Hosted Data: we take no active part in collecting it. TRA's staff may occasionally access Hosted Data through delivery of services and support to customers. For instance, staff

may come into contact with Hosted Data by verifying back-up and restore processes, by verifying that applications are running properly, or through debugging efforts.

Use of Personally Identifiable Information and Hosted Data

A. TRA doesn't share personally identifiable information under any circumstances, except as provided in paragraph B below and except: (1) as requested by law enforcement agencies, required by law, or otherwise necessary to comply with legal obligations; (2) to maintain the security of the Service and of TRA's own network and data, including by assisting third party claimants in investigating security breaches; (3) to collect money owed to TRA, including through legal proceedings; and (4) to identify, contact, or take legal action against customers or third parties violating TRA's Terms of Service, interfering with property rights or with the Service, or breaking the law. In addition, in the event that TRA or substantially all of its assets are acquired, customer information will of course be one of the transferred assets. TRA is the sole owner of any and all information collected through the use of the Site.

B. TRA sometimes employs independent contractors to help run the Service, and such contractors may have access to data, similar to the access we give our employees.

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Data Protection

TRA takes precautions to ensure that access to databases containing customer information is available only from within TRA's internal network. Further, we typically encrypt financial information during transmission, or use secure protocols. No protocol, encryption, or other precaution can provide complete security for electronic data, so we don't provide a guarantee of security.

Changing Account Information

Customers can change their account information. Most customers can do so via TRA's online customer portal at www.tra-llc.com. All other customers can access and change account information by contacting their TRA billing department at info@tra-llc.com.

Reporting Misuse of Data

Customers and other third parties should contact TRA about any suspected misuse of their personally identifiable information or other data. All such inquiries or complaints should be directed to us via email to info@tra-llc.com.

Not Applicable to Third Party Data Handlers

This Privacy Policy doesn't address use of data by our customers or by other third parties, even if the data is stored on one of TRA's computers or collected through a website we host (Hosted Data), or collected through a website linked to our website. TRA is not responsible for use or misuse of data by any third party, including any TRA customer or the operator of a website linked to one of our websites.