

Privacy Policy and Client Information Release Authorization

Jefferson East, Inc. (JEI) is committed to protecting the privacy of all individuals, families, small business owners, and entrepreneurs who seek our assistance or participate in our programs. We understand that the information you share with us is often personal and sensitive in nature. We want to assure you that all personal and business information—whether shared orally, electronically, or in writing—will be handled with the utmost care, in accordance with applicable ethical standards and privacy laws.

This notice explains how JEI collects, uses, and safeguards your nonpublic personal and business information. We encourage you to review it carefully to understand our commitment to confidentiality and the steps we take to protect your data.

What is nonpublic, personal and business information?

Nonpublic personal and business information refers to any information that identifies an individual or a business and is not otherwise publicly available. This includes, but is not limited to:

- **Personal Identifiers:** Information such as your name, address, date of birth, phone number, Social Security Number, driver's license number, or other government-issued identification.
- **Demographic and Sensitive Data:** Information such as race, ethnicity, gender, or household composition, collected only when required or permitted by law and used solely for program reporting or compliance.
- **Personal Financial Information:** Details such as your credit history, income, employment information, financial assets, bank account details, and outstanding debts.
- Business Information: Nonpublic data related to your business, including your business name (if not publicly registered), Employer Identification Number (EIN), business address, ownership details, financial statements, tax records, payroll data, vendor information, and other proprietary or operational details shared with JEI in connection with technical assistance, grants, or program support.
- **Digital and Application Information:** Information collected through applications, forms, or online services, including email correspondence, survey responses, or uploaded documents containing personally or commercially sensitive information.

JEI does **not** collect or disclose any information that is publicly available, such as business information already filed with public agencies or listed in public directories, unless it is combined with other nonpublic information you provide.

What personal information does JEI collect about you?

We collect personal information about you from the following sources:

- Information that you provide on applications, forms, email, or verbally;
- Information about your transactions with us, our affiliates, or others;
- Information we receive from your creditors or employment references; Credit Reports



What categories of information do we disclose and to whom?

We may disclose the following personal Information to financial service providers (such as companies providing home mortgages), Federal (HUD), and State (MSHDA) Housing Authorities, for program review, monitoring, auditing, research, and/or oversight purposes, and/or any other pre-authorized individual and/or organization. The types of information we disclose are as follows:

- Information you provide on applications/forms or other forms of communication. This Information may include your name, address, Social Security Number, employer, occupation, account numbers, assets, expenses, and income;
- Information about your transactions with us, our affiliates, or others; such as your account balance, monthly payment, payment history, and method of payment;
- Information we receive from a consumer credit reporting agency; such as your credit bureau reports, your credit and payment history, your credit scores, and/or your creditworthiness;
- We do not sell or rent your personal information to any outside entity;
- We may share anonymous, aggregated case file information; but this information may not be disclosed in a manner that would personally identify you in any way. This is done in order to evaluate our program, gather valuable research information, and/or design future programs;
- We may also disclose personal information about you to third parties as permitted by law.

How is your personal information secured?

We restrict access to your nonpublic personal information to JEI employees who need to know that information in order to perform their housing counseling duties. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information; and we train our staff to safeguard client information and prevent unauthorized access, disclosure, or use.