

# PRIVACY POLICY

**Last Updated: 2025**

**Effective Date: August 1, 2025**

## 1. INTRODUCTION AND SCOPE

### 1.1 Company Information

This Privacy Policy (“Policy”) is issued by The Housing Assistant, LLC (THA) (“we,” “us,” “our,” or the “Company”), a business located at 202 Hunters Lane, Hendersonville, TN 37075.

### 1.2 Website Coverage

This Policy applies to all personal information collected through our website located at <https://thehousingassistant.com/> (the “Website”), including all associated pages, subdomains, mobile applications, and related services.

### 1.3 Policy Purpose

This Policy describes how we collect, use, disclose, and protect the personal information of our Website users (“you” or “users”). It also explains your privacy rights and how you can exercise those rights.

### 1.4 Jurisdictional Scope

While our Website may be accessible globally, this Privacy Policy is designed to comply with the laws of Tennessee and applicable federal laws of the United States. If you access our Website from outside the United States, you acknowledge and agree that your information may be processed in the United States and subject to United States law.

### 1.5 Contact Information

For privacy-related inquiries, you may contact us at:

- **Email:** [info@thehousingassistant.com](mailto:info@thehousingassistant.com)
- **Mailing Address:** 105 Imperial Boulevard #278, Hendersonville, TN 37077

## 2. INFORMATION WE COLLECT

### 2.1 Personal Information

We collect personal information that is reasonably necessary and proportionate to provide our e-commerce services. This information includes:

#### *2.1.1 Account and Profile Information*

- Full name

- Email address
- Billing and shipping addresses
- Phone number
- Account username and password

#### *2.1.2 Transaction Information*

- Payment card information (card type, last four digits, expiration date)
- Purchase history
- Order details
- Shipping information
- Billing information

### **2.2 Automatically Collected Information**

When you visit our Website, certain information may be automatically collected through cookies and similar technologies:

#### *2.2.1 Device Information*

- IP address
- Browser type and version
- Operating system
- Device type
- Unique device identifiers

#### *2.2.2 Usage Information*

- Pages visited
- Time and date of visits
- Time spent on pages
- Referring website addresses
- Other browsing behavior as deemed appropriate

### **2.3 Cookies and Similar Technologies**

We use only essential cookies necessary for the proper functioning of our Website. These cookies are required for core features such as:

- Maintaining shopping cart contents

- Preserving user session information
- Enabling secure login functionality
- Processing transactions
- Remembering user preferences

We do not use cookies for advertising, analytics, or tracking purposes beyond what is essential for Website functionality.

## **2.4 Information Collection Methods**

We collect information through:

- Direct submission when you create an account, place an order, or fill out forms
- Automated technologies for essential Website functionality
- Communications when you contact our customer service

## **3. HOW WE USE YOUR INFORMATION**

### **3.1 Primary Purposes**

We use your personal information only for purposes that are adequate, relevant, and limited to what is necessary for our legitimate business operations:

#### *3.1.1 Account Management*

- Creating and maintaining your account
- Authenticating your identity
- Providing customer support
- Responding to your inquiries
- Sending service-related communications

#### *3.1.2 Website Functionality*

- Ensuring proper display and operation of the Website
- Maintaining shopping cart functionality
- Enabling secure checkout processes
- Preventing fraudulent transactions
- Troubleshooting technical issues

### **3.2 Secondary Purposes**

We may also use your information for the following limited purposes:

### *3.2.1 Business Operations*

- Improving our products and services
- Maintaining business records
- Conducting internal audits and analysis
- Detecting and preventing fraud
- Enforcing our Terms of Service

### *3.2.2 Legal Compliance*

- Complying with applicable laws and regulations
- Responding to legal process
- Protecting our rights, privacy, safety, or property
- Protecting against legal liability

## **3.3 Limitations on Use**

We do not use your personal information for:

- Targeted advertising or marketing
- Profiling or automated decision-making
- Selling or renting to third parties
- Any purpose beyond what is disclosed in this Policy

## **4. INFORMATION SHARING AND DISCLOSURE**

### **4.1 No Sale of Personal Information**

We do not sell, rent, or lease your personal information to any third parties under any circumstances.

### **4.2 Limited Sharing**

We maintain your personal information internally and do not share it with third parties except in the following limited circumstances:

#### *4.2.1 Payment Processing*

Despite our general policy against third-party sharing, we necessarily engage third-party payment processors to facilitate secure payment transactions. These processors receive only the information necessary to process your payments (such as payment card information) and are contractually obligated to use this information solely for processing your payments and complying with applicable laws.

#### *4.2.2 Legal Requirements*

We may disclose your information if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency).

#### *4.2.3 Protection of Rights*

We may disclose your information when we believe in good faith that disclosure is necessary to:

- Protect our rights, property, or safety
- Enforce our Terms of Service
- Investigate potential violations or illegal activities
- Prevent fraud or security issues

### **4.3 Third-Party Service Provider Requirements**

In the limited instances where we engage third-party service providers who may access your personal information (such as payment processors), we implement the following protections:

- Written contracts requiring confidentiality and appropriate security measures
- Restrictions limiting use of your information solely to providing services to us
- Prohibitions against retaining, using, or disclosing your information for any other purpose
- Requirements to comply with applicable privacy laws and regulations
- Obligations to notify us of any data breaches or security incidents

### **4.4 Business Transfers**

If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction. We will notify you via email and/or a prominent notice on our Website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your information.

## **5. DATA RETENTION AND STORAGE**

### **5.1 Retention Periods**

We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected and to comply with applicable legal obligations. Specifically:

#### *5.1.1 Transaction Records*

We retain transaction records, including purchase history and payment information, for 2-3 years after the transaction date for:

- Tax compliance purposes

- Accounting requirements
- Warranty and return processing
- Fraud prevention and detection
- Resolving disputes

#### *5.1.2 Account Information*

We retain account information for as long as your account remains active, plus a reasonable period thereafter to:

- Facilitate account reactivation
- Respond to questions about past orders
- Comply with legal obligations

#### *5.1.3 Marketing Data*

We retain marketing-related information for 1 year after your last interaction with us, unless you request earlier deletion.

#### *5.1.4 Communications*

We retain communications with our customer service team for 2 years to:

- Maintain service quality
- Train our staff
- Address ongoing or related inquiries
- Resolve disputes

### **5.2 Data Minimization**

We implement data minimization principles by:

- Collecting only information necessary for our stated purposes
- Regularly reviewing stored data to identify and securely delete unnecessary information
- Anonymizing or aggregating data when possible for analytical purposes

### **5.3 Deletion Practices**

When personal information is no longer needed, we employ secure deletion methods appropriate to the sensitivity of the information, including:

- Secure overwriting of electronic records
- Physical destruction of paper records

- Anonymization of data needed for statistical or analytical purposes

#### **5.4 Data Storage Location**

All personal information is stored on secure servers located within the United States. We do not transfer your personal information outside the United States.

### **6. YOUR PRIVACY RIGHTS**

#### **6.1 Current Privacy Rights**

Under current Tennessee law, you have the right to:

##### *6.1.1 Access*

Request confirmation of whether we are processing your personal information and receive copies of your personal information in our possession.

##### *6.1.2 Correction*

Request that we correct inaccurate personal information we maintain about you.

##### *6.1.3 Deletion*

Request deletion of your personal information in certain circumstances, subject to legal retention requirements.

#### **6.2 Future Rights Under TIPA**

Beginning July 1, 2025, when the Tennessee Information Protection Act (TIPA) becomes effective, you will have additional rights, including:

##### *6.2.1 Right to Confirm and Access*

The right to confirm whether we are processing your personal information and to access that information.

##### *6.2.2 Right to Correction*

The right to correct inaccuracies in your personal information.

##### *6.2.3 Right to Deletion*

The right to delete personal information provided by or obtained about you.

##### *6.2.4 Right to Data Portability*

The right to obtain a copy of your personal information in a portable and readily usable format.

##### *6.2.5 Right to Opt Out*

The right to opt out of the processing of your personal information for purposes of:

- Targeted advertising

- Sale of personal information
- Profiling in furtherance of decisions that produce legal or similarly significant effects

### **6.3 How to Exercise Your Rights**

To exercise your privacy rights, you may contact us through the following methods:

#### *6.3.1 By Mail*

Send a written request to:

The Housing Assistant, LLC

Attn: Privacy Requests

105 Imperial Boulevard #278

Hendersonville, TN 37077

### **6.4 Verification Process**

To protect your privacy and security, we will take reasonable steps to verify your identity before granting access to or making changes to your personal information. This may include:

- Requesting specific information to confirm your identity
- Matching information you provide with information we already maintain
- For sensitive requests, requiring more stringent verification methods

### **6.5 Response Timeline**

We will respond to your privacy requests as follows:

- Initial confirmation of receipt within 10 business days
- Substantive response within 45 days of receiving your request
- If necessary, we may extend this period by an additional 45 days, provided we notify you of the extension within the initial 45-day period

### **6.6 Authorized Agents**

You may designate an authorized agent to submit requests on your behalf. Authorized agents must provide proof of your written permission and verify their own identity. We may still require you to directly verify your identity in certain circumstances.

### **6.7 Non-Discrimination**

We will not discriminate against you for exercising any of your privacy rights. This means we will not:

- Deny you goods or services



- Charge you different prices or rates for goods or services
- Provide you with a different level or quality of goods or services
- Suggest that you may receive different prices, rates, or quality of goods or services

## **7. DATA SECURITY**

### **7.1 Security Measures**

We implement and maintain reasonable administrative, technical, and physical safeguards designed to protect the security, confidentiality, and integrity of your personal information. These measures include:

#### *7.1.1 Administrative Safeguards*

- Regular security training for all personnel with access to personal information
- Access controls limiting employee access to personal information on a need-to-know basis
- Security policies and procedures governing the handling of personal information
- Regular security assessments and audits
- Vendor management procedures for third-party service providers

#### *7.1.2 Technical Safeguards*

- Secure Sockets Layer (SSL) encryption for all data transmissions
- Encryption of sensitive personal information at rest
- Firewalls and intrusion detection systems
- Regular security patches and updates
- Password protection and multi-factor authentication for system access
- Secure backup systems

#### *7.1.3 Physical Safeguards*

- Controlled access to facilities where personal information is stored
- Monitoring and surveillance of physical premises
- Secure disposal of physical media containing personal information

### **7.2 Data Breach Response**

In the event of a security breach affecting your personal information, we will:

#### *7.2.1 Investigation and Containment*

Promptly investigate the incident, take steps to contain the breach, and assess the nature and scope of the compromise.

### *7.2.2 Notification*

In accordance with Tennessee's Data Breach Notification Law (Tenn. Code § 47-18-2107), we will notify affected individuals without unreasonable delay, but no later than 45 days after discovery of the breach, unless a longer period is required for legitimate needs of law enforcement.

### *7.2.3 Notification Content*

Our breach notifications will include:

- The timing, circumstances, and nature of the unauthorized access
- The information compromised
- Steps we have taken to protect your information from further unauthorized access
- Steps you can take to protect yourself
- Contact information for further assistance

### *7.2.4 Regulatory Notification*

When required by law, we will notify the Tennessee Attorney General and other relevant regulatory authorities of the breach.

## **7.3 Limitations**

While we implement reasonable security measures, no method of transmission over the Internet or electronic storage is 100% secure. We cannot guarantee absolute security of your personal information. You are responsible for maintaining the confidentiality of any passwords associated with your account.

## **8. CHILDREN'S PRIVACY**

### **8.1 Age Restrictions**

Our Website is not directed to children under the age of 13, and we do not knowingly collect personal information from children under 13 years of age.

### **8.2 COPPA Compliance**

We comply with the Children's Online Privacy Protection Act (COPPA), 15 U.S.C. §§ 6501-6506, which requires parental consent for collection of personal information from children under 13.

### **8.3 Parental Rights**

If you are a parent or guardian and believe we may have inadvertently collected personal information from your child under the age of 18, please contact us immediately at [info@thehousingassistant.com](mailto:info@thehousingassistant.com). Upon verification of your identity as the child's parent or guardian, we will:

- Provide you with a description of the information collected
- Delete the information from our records upon request
- Ensure that the information is not used or disclosed

#### **8.4 Verification of Age**

We may use age-gating measures on certain portions of our Website to verify users' ages and prevent children under 18 from providing personal information.

### **9. COOKIES AND TRACKING TECHNOLOGIES**

#### **9.1 Essential Cookies Only**

We use only essential cookies that are strictly necessary for the proper functioning of our Website. These cookies are required for core features such as:

##### *9.1.1 Functionality Cookies*

- Maintaining shopping cart contents during your browsing session
- Remembering your login status within a session
- Enabling secure checkout processes
- Storing basic preferences for website display

##### *9.1.2 Security Cookies*

- Detecting and preventing fraudulent activity
- Maintaining secure sessions
- Verifying user identity during a session

#### **9.2 Cookie Lifespan**

Our essential cookies may be either “session cookies” (which expire when you close your browser) or “persistent cookies” (which remain on your device for a limited period, typically no longer than necessary to fulfill their purpose).

#### **9.3 No Third-Party Tracking**

We do not allow third-party tracking technologies on our Website. We do not use:

- Third-party analytics cookies
- Advertising or marketing cookies
- Social media cookies
- Cross-site tracking technologies

## **9.4 Browser Controls**

Most web browsers allow you to control cookies through their settings preferences. However, if you choose to disable cookies, you may not be able to use some features of our Website, as essential cookies are required for core functionality.

## **9.5 Do Not Track Signals**

We do not currently respond to “Do Not Track” signals from web browsers as we only use essential cookies necessary for Website functionality.

# **10. POLICY UPDATES AND CHANGES**

## **10.1 Policy Revisions**

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. We reserve the right to modify this Policy at our discretion.

## **10.2 Notification of Changes**

We will notify you of material changes to this Policy by posting the updated Policy on our Website with a new “Last Updated” date at the top of this Policy. We rely on you to periodically review this Policy to stay informed about our privacy practices.

## **10.3 Continued Use**

Your continued use of our Website after the posting of changes constitutes your acceptance of such changes. If you do not agree with the revised Policy, you should discontinue your use of our Website.

## **10.4 Material Changes**

For material changes that significantly affect the collection, use, or disclosure of your personal information, we will make the updated Policy prominent on our Website for a reasonable period.

## **10.5 Prior Versions**

Previous versions of this Privacy Policy will be archived and made available upon request.

# **11. CONTACT INFORMATION**

## **11.1 Privacy Inquiries**

For questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us at:

- **Email:** [info@thehousingassistant.com](mailto:info@thehousingassistant.com)
- **Mailing Address:** 105 Imperial Boulevard #278, Hendersonville, TN 37077

### **11.2 Response Time**

We strive to respond to all privacy-related inquiries within thirty (30) business days.

### **11.3 Complaints**

If you believe your privacy rights have been violated, you may file a complaint with us by contacting us through the methods listed above. We will investigate your complaint and respond within a reasonable timeframe.

### **11.4 Regulatory Authorities**

You also have the right to file a complaint with relevant regulatory authorities, including the Tennessee Attorney General's Office.