<div align="center">**Management Computer Services, Inc. (MCS) Privacy Policy**</div>

1. Introduction and Definitions

1.1. In this Privacy Policy ("Policy"), "MCS" refers to Management Computer Services, Inc. and "PHA" refers to the public housing authority or housing agency that has a contract with MCS.

1.2. In this Policy, "Application" refers to one or all of the following: (1) PHA-Web Housing Management System ("PHA-Web"); (2) PHA-Web Mobile System ("PHA-Web Mobile"); (3) MCS Support Manager helpdesk system ("Support Manager"); and (4) MCS Friday Facts newsletter ("Friday Facts").

1.3. MCS is committed to safeguarding the privacy of the PHA data. This Policy explains how MCS may collect, use, maintain, and protect the PHA data. MCS will specify which Policy provisions apply only to certain Applications.

2. What Data We Collect

2.1. The following information about the PHA is stored in the MCS software: (1) the name, address, telephone number, email of the PHA; and (2) the name, telephone number, email of the person at the PHA who is responsible for account payments. MCS will use this account information to inform the PHA of upcoming changes to the system (including availability), and to administer and send invoices to the PHA in accordance with the parties' contract.

2.2. The PHA has the option to store any information required for the administration of the PHA programs in the MCS software. The PHA has full control of what data is inputted and stored and the PHA can therefore edit and delete this data. MCS may use email addresses associated with accounts to send automated emails relating to password resets, account creations, and event notifications. MCS will not use this information to send marketing information. MCS only accesses stored data in order to provide software support, ensure PHA-Web remains running, or to fix software issues.

2.3. For PHA users of the MCS software, the following information is stored about the PHA: (1) IP Addresses; (2) information about the PHA computer, including the operating system and web browser; and (3) the timing of when users have logged in to the PHA-Web. MCS uses this information to monitor the security of the MCS service, to ensure that MCS is supporting the necessary hardware/browsers, and to improve the MCS website.

2.4. For PHAs that use PHA-Web Mobile, MCS stores the following information: (1) the make, model, and operation system version of the user's tablet or device; and (2) the timing of when users have logged in to PHA-Web Mobile. MCS uses this information in order to improve service and to ensure that the necessary devices are being supported.

2.5. For PHAs that use Support Manager, MCS stores the following information: (1) the name, email, and telephone number(s) of the person creating the support ticket; and (2) any personal data provided to MCS by the person creating the support ticket (i.e., the contents of the ticket). MCS uses this information in order to support the PHA via Support Manager.

2.6. For PHAs that receive the Friday Facts newsletter, MCS stores the following information: (1) the email of the person who receives the newsletter. MCS uses this information in order to send out the newsletter.

3. How Do We Collect the Data?

3.1. The data that MCS collects is entered into MCS software by the PHA, or is otherwise provided by the PHA to MCS. The data referenced in Sections 2.3 and 2.4 is automatically collected by MCS when the PHA accesses the MCS software.

4. Who Owns the Data?

4.1. The data stored in PHA-Web is owned by the PHA. MCS stores the data on behalf of the PHA.

5. Disclosing Data

5.1 MCS does not disclose the data to third parties unless requested to do so by the PHA or if required by law to do so.

5.2. MCS only accesses the data in order to support the PHA, to ensure the application remains running, or to fix issues.

6. Where Is the Data Stored?

6.1. Information will be stored in the MCS data center in Medford, MA; the MCS data center in Tempe, AZ; or any other data centers established by MCS.

6.2. PHA data will not leave the MCS data centers except in order to locally debug an issue with MCS software affecting the PHA.

7. Data Retention

7.1. MCS will not delete PHA data while the PHA has an active contract with MCS. The PHA can use the data to comply with the PHA's own data retention policy.

7.2. Annually, MCS will delete all PHA data for PHAs that have terminated their contract with MCS. All PHA data will be permanently removed, including but not limited to: users, applicants, tenants, and landlords. The stored data can be downloaded by the PHA at any time prior to termination of the contract.

7.3. MCS retains Friday Facts data while the PHA account is active. Friday Facts data is deleted with other user data six months after termination of the contract with MCS.

8. Security of PHA Data

8.1. MCS will take reasonable technical and organizational precautions to prevent the loss, disclosure, misuse or alteration of the PHA data.

8.2. The PHA is responsible for keeping the passwords used for accessing the PHA data confidential and secure.

9. Data Breaches

9.1. MCS will comply with all laws applicable to data breach issues.

9.2 MCS will notify the PHA affected by a data breach without undue delay once MCS becomes aware of such a breach.

10. Use of Sub-Processors

10.1. As part of providing MCS service to the PHA, MCS may use the following Sub-Processors: (1) Fattmerchant – for online payment processing; and (2) Screen Connect– to facilitate MCS support to remotely connect to the PHA. MCS will always ask for permission from the PHA before connecting remotely using Screen Connect. Data transferred via Screen Connect is encrypted and not visible by Screen Connect.

10.2. MCS may update the sub-processors used to provide services to the PHA. Updates to the sub-processors used will be reflected by Amendments to this Policy.

10.3 This Policy does not apply to information collected by the Sub-Processors. MCS recommends the PHA read the privacy policies of these Sub-Processors to understand the manner in which PHA's data will be handled by these Sub-Processors.

11. California Resident

11.1. California residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing use. To make such a request, please send an email to info@pha-web.com or mail a request to Management Computer Services, Inc., PO Box 523, Sparta, WI 54656-0523.

12. Amendments to Privacy Policy

12.1. MCS may, in its sole and absolute discretion, amend and update this Policy from time to time by publishing a new version on the MCS website and, where appropriate, will notify the PHA via email.

12.2. The PHA is responsible for reading and understanding the privacy policy when notified of a new privacy policy. The PHA's use of MCS software is deemed to be an acceptance of those updates.

13. Cookies

13.1. Our website does use cookies.

14. Governing Law

14.1 All matters relating to the MCS software and services is governed exclusively by the laws of the State of Wisconsin.

15. MCS Details

15.1. This privacy policy is property of Management Computer Services, Inc (MCS).

15.2. Any questions or comments about this Policy may be emailed to info@pha-web.com or mailed to Management Computer Services, Inc., PO Box 523, Sparta, WI 54656-0523.