

## Atlanta Housing Privacy Notice

**Last Modified Date: July 30, 2021**

**PLEASE READ THIS PRIVACY NOTICE CAREFULLY.**

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## Scope

This Privacy Notice details how The Housing Authority of the City of Atlanta, Georgia (**“Atlanta Housing” “we” “us” or “AH”**) will collect, use, disclose and protect personal information (**“Personal Information”**) obtained from: (a) visitors to our website; (b) visitors to our offices and events we sponsor; and, (b) individuals who communicate with us via email. This Notice also describes the rights that you have with respect to such Personal Information.

## What Is Personal Information

**Personal Information** is defined differently by different laws. However, generally speaking, it is a category of information that can be used to identify a person, household or device or that can be reasonably associated with a person, household or device.

## AH’s Collection of and Purpose for Collecting Personal Information

### **Personal Information collected:**

**AH collects various categories of Personal Information from individuals with whom we interact. Listed below are the categories of Personal Information collected, and purpose for collection.**

| <b><u>Source</u></b>   | <b><u>Personal Information Collected</u></b>   | <b><u>Purpose for Collection</u></b>  |
|--|--|---|
| <b><u>AH’s website:</u></b><br>When you use AH’s website, we collect Personal Information about you both directly from information you submit and indirectly from your operating device and your activity. Depending on the type of interaction you have with our website, we may collect some or all of the information reflected in the next column. | <b><u>Personal Identifiers</u></b> such as first name, last name, email address, country location, cell phone number, home phone number, current address, portal user name and password, Atlanta Housing Vendor Number, Atlanta Housing Tenant Code number, and social media handles.<br><br><b><u>Protected Class Information</u></b> such as gender and age, as well as the following: whether an individual is a U.S. citizen, whether immigration sponsorship is required for employment, whether an individual has ever served in the military, and whether an individual | <b>AH collects the Personal Information via AH’s website for one or more of the following reasons:</b><br>(a) To establish and maintain accounts with property owners and property managers who participate in our programs;<br>(b) To respond to requests for rental estimates;<br>(c) To enable individuals to apply for employment and to communicate with applicants regarding such;<br>(d) To enable individuals to apply to our housing programs and to communicate |

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|  | <p>requires accommodation for a disability in the context of employment.</p> <p><b><u>Professional or Employment Information</u></b> such as current occupation, employment status, date available for work, type of work desired (full-time or part-time), salary requirements, whether you are currently employed and related details, certifications held, trainings attended, whether there would be a conflict of interest if employed by AH, whether any family member is employed at AH, whether a political office is held, whether an individual has participated in a political campaign of a partisan nature, and whether an individual is employed at an agency that does business with or supplies goods and services to AH.</p> <p><b><u>Education Information</u></b> such as schools attended, degrees earned, highest level of education achieved, and other such information for employment purposes.</p> <p><b><u>Other Sensitive Information</u></b> such as payment card information, whether an individual has a current driver's license and whether an individual has been convicted of a crime.</p> <p><b><u>Commercial Information</u></b> such as company name, bank account information (for landlords and some other vendors only, for payment purposes), business type, media outlet, whether an individual is an investor/property owner/property manager, whether</p> | <p>with applicants and program participants;</p> <p>(e) To enable businesses to interact with AH regarding requests for proposals and bid submissions;</p> <p>(f) To send out our newsletter;</p> <p>(g) To communicate regarding events we host;</p> <p>(h) To respond to questions or concerns raised to us;</p> <p>(i) To improve the operation of our website, and/or;</p> <p>(j) For security purposes</p> |
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|   | <p>an individual owns property for lease, and whether an individual is a current AH landlord.</p> <p><b><i>Operating System Information</i></b> such as details about how our website is being used, Internet protocol (IP) address, web pages viewed, date and time of visit, domain type, device event information such as crashes that occur, system activity, hardware, settings, browser type or version, browser language, referral URL and region or general location from which your computer or device is accessing the Internet.</p> |   |
| <p><b><u>From you:</u></b><br/> When you visit AH's office(s), attend an AH event or an event at which we are a presenter, or send us written or electronic correspondence, we may collect Personal Information about you. The type and amount of information that we collect depends on the reason for the interaction. In addition, when you correspond with AH, you ultimately determine the Personal Information that you disclose to us. Possible categories of Personal Information that we may collect in these contexts are listed in the next column and</p> | <p>The categories listed below are described more fully above.</p> <p>Personal Identifiers</p> <p>Protected Class Information</p> <p>Professional or Employment Information</p> <p>Education Information</p> <p>Other Sensitive Information</p> <p>Commercial Information</p> <p>Operating System Information</p>  | <p><b>AH collects the Personal Information via AH's website for one or more of the following reasons:</b></p> <p>(a) To establish and maintain accounts with property owners and property managers who participate in our programs;</p> <p>(b) To respond to requests for rental estimates;</p> <p>(c) To enable individuals to apply for employment</p> <p>(d) To communicate with applicants regarding employment applications;</p> <p>(e) To enable individuals to apply to our housing programs</p> <p>(f) To communicate with housing program applicants and participants;</p> <p>(g) To enable businesses to interact with AH regarding requests for proposals and bid submissions;</p> |

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|---|--|---|
| <p>includes photographs taken at our events and those of our employees.</p>   |  | <p>(h) To respond to questions or concerns individuals may have;<br/> (i) For security purposes</p>   |
| <p><b><u>Video Recordings and Photographs</u></b><br/> AH utilizes video recording devices in our office locations.</p> <p>Video recording only occurs in areas where there is no reasonable expectation of privacy (e.g., lobbies, driveways, parking areas, entrances and hallways).</p> <p>AH treats information obtained through video recordings as confidential, and limits access to security personnel or management personnel with a need to know.</p> |  | <p><b>AH collects the video recordings of employees and visitors for one or more of the following reasons:</b></p> <ul style="list-style-type: none"> <li>(a) Health and safety of workers and visitors;</li> <li>(b) Crime prevention and detection;</li> <li>(c) Monitoring workplace conduct of workers and visitors.</li> </ul> |

**Data Collection Through Cookies**

In addition to the above, we use “cookies” to collect Personal Information. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes.

**What Cookies Do We Use and Why**

AH’s website uses **Google Analytics**. Google Analytics places cookies on your computer that generate specific information that we select about your use of the website, including your computer’s IP address. That information will be transmitted to and stored by Google. The information will be used by AH to evaluate individual use of the website, compile reports on website activity, and provide other services relating to website activity and usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. The use of cookies by Google Analytics is covered by Google’s privacy policy: <https://www.google.com/policies/privacy/>.

**[How You Can Manage Cookies](#)**

The cookies used on our website can be enabled or disabled through your browser. To disable cookies through your browser, follow the instructions usually located within the “Help,” “Tools” or “Edit” menus in your browser. Please note that disabling a cookie or category of cookies does not delete the cookie from your browser unless manually deleted through your browser function. Disabling cookies may impact your ability to use certain features of the website.

**[AH’s Disclosure and Sale of Personal Information](#)**

AH does not sell Personal Information. AH may disclose Personal Information as necessary in connection with any of the purposes for which we collect and use Personal Information.

| Purpose for Disclosure    | To Whom and Further Detail   |
|---------------------------|--|
| For our business purposes | We use service providers for various purposes including: <ul style="list-style-type: none"> <li>(a) to design and host our AH website through which Personal Information is collected;</li> <li>(b) to provide, maintain and host our portal through which individuals can apply to be recipients of our program benefits and, in doing so, submit Personal Information;</li> <li>(c) to provide, maintain and host our electronic procurement system through which Personal Information may be collected;</li> <li>(d) to provide information to other City agencies or officer or other government agencies as required by policy, law or regulation;</li> </ul> |

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|                          | We also disclose personal information to other entities with which we have data sharing agreements on a limited basis.  |
| To fulfill your requests | <p>We may disclose Personal Information to third parties with whom we have executed agreements to:</p> <ul style="list-style-type: none"> <li>(a) provide a platform through which individuals can apply for housing services and submit rental payments to property owners;</li> <li>(b) provide a platform through which government procurement activity can be managed;</li> <li>(c) provide a platform to manage AH's event management and ticketing activity;</li> <li>(d) provide a platform through which landlords can list properties for rent and tenants can search for properties;</li> <li>(e) to validate the identity and other information submitted by employment applicants;</li> <li>(f) provide online video telephony services;</li> <li>(g) provide to other City agencies or officers or other government agencies as required to fulfill requests;</li> </ul> |
| For legal purposes       | <p>For instance:</p> <ul style="list-style-type: none"> <li>(a) to investigate, prevent or take action regarding actual or suspected illegal activities or fraud, situations involving potential threats to the physical safety of any person, or violations of our terms of use;</li> <li>(b) to respond to or defend against subpoenas, court orders, or other legal process;</li> <li>(c) to respond to requests made under Freedom of Information Laws ("FOIL"), including the Georgia Open Records Act, if such information is not otherwise protected;</li> <li>(d) to establish or exercise our legal rights;</li> <li>(e) to otherwise comply with applicable law</li> </ul>  |

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In each instance, when AH utilizes a third party to provide services that involve collection or processing of Personal Information by the third party, AH restricts the third party's ability to use or disclose the information. Third parties may only use the Personal Information for the purpose of fulfilling their obligations under a contract with AH. In some cases, the third party is granted permission to use Personal Information in order to improve the products/services they provide so long as the information is aggregated or, de-identified so that it cannot be traced back to AH or any of our housing program participants.

### **Third-Party Links and Websites**

Our website contains links to third-party websites and services. While we endeavor to work with third parties that share our respect for user privacy, we are not responsible for the websites or privacy practices of such third-parties. You are responsible for knowing when you are leaving our website to visit a third party website, and for reading and understanding the terms of use and privacy policy statements for each such third party.

### **Advertisers, Marketing and Privacy Choices**

#### **Your Choices and Controls**

**Marketing communications and sharing with third parties.** If you want to opt out of receiving our newsletter, you may send us an email at [leads@atlantahousing.org](mailto:leads@atlantahousing.org) and request such. You can also opt out of receiving our email communications by utilizing the "unsubscribe" instructions provided in any marketing email you receive from us.

#### **“Do Not Track” and Targeted Ads**

We do not respond to web browser “Do Not Track” signals. We do not serve targeted advertisements on our website at this time. To learn more about browser tracking signals and “Do Not Track”, visit <http://www.allaboutdnt.com>.



### **Children Under 13**

AH's website is not directed to persons under 13. We do not knowingly collect Personal Information from children under 13. If you become aware that your child is accessing the website and providing Personal Information without your consent, please contact us via email or phone:

- Email: [leads@atlantahousing.org](mailto:leads@atlantahousing.org)
- Phone: 404-892-4700

We will take steps to remove Personal Information from our servers and terminate any related account should we determine that a child under 13 has provided Personal Information via the website.

### **Social Media and Community Platforms**

Any information, communications, or material of any type or nature that you submit to a social media or community platform (including, but not limited to any Atlanta Housing pages on a social media platform such as Facebook, Instagram, LinkedIn, or Twitter) by e-mail, posting, messaging, uploading, downloading, or otherwise (collectively, a "**Submission**"), is done at your own risk and without any expectation of privacy. We cannot control the actions of other users of any third party social media platform or website. By visiting our pages contained on a social media platform, you are representing and warranting to us that you have reviewed the applicable Privacy Notice and terms of use of such platform or website and that you will abide by all such provisions contained therein. We do not control who reads postings on our social media pages, or how they may use or disclose such information. If you choose to voluntarily disclose information, that information will be publicly available and can be collected and used by others. For example, if you post your e-mail address, you may receive unsolicited messages from unrelated third parties.

### **Access to and Ability to Correct Your Information and to Opt Out**

If the Personal Information that we maintain about you is incorrect, you may contact us via email or phone and request a correction. By providing your Personal Information to us, you agree that we can communicate with you electronically regarding any security, privacy, business or administrative issues relating to your use of the website. If, at any time after registering your Personal Information or after electing to register for an online account, you change your mind about receiving information from us, send us a request specifying your new choice via email or phone:

- Email: [leads@atlantahousing.org](mailto:leads@atlantahousing.org)

- Phone: 404-892-4700

## **How We Protect Your Information**

AH works hard to protect the Personal Information we process from unauthorized access, alteration, disclosure, or destruction, including by:

- maintaining a secure firewall configuration to protect data
- regularly updating anti-virus software and keeping security patches up-to-date
- restricting access to data to those with a “need to know”
- regularly testing security systems and processes
- maintaining a policy that addresses information security for employees and contractors
- restricting physical access to Personal Information
- when media containing Personal Information is destroyed or purged, it is done in a secure manner

## **Changes or Updates to this Privacy Notice**

We reserve the right to revise or update this Privacy Notice at any time, and each update to the Privacy Notice will reflect the “Last Modified” Date. Your interaction with AH through the methods discussed in this Privacy Notice constitutes your assent to the terms contained herein. You should periodically revisit the Privacy Notice to learn of any revisions or updates.

In the event we materially change the way in which we use Personal Information, AH will provide at least 30 days’ notice of any material changes to this Privacy Notice by posting a Notice of Change to our website.

If you have specific questions about this Privacy Notice, please e-mail us at [leads@atlantahousing.org](mailto:leads@atlantahousing.org).

## **Contact Us**

If you have questions or complaints about this Privacy Notice, or if you wish to exercise any of your rights in relation to your personal information, please email us at [leads@atlantahousing.org](mailto:leads@atlantahousing.org) or write to us at:

Atlanta Housing  
Attn: Communications, Marketing and Public Engagement Department

230 John Wesley Dobbs Avenue, NE  
Atlanta, GA 30303  
Phone: 404-892-4700

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your Personal Information.