

# 10 “Must-Do’s” for Property Managers

## DO YOU...?

*Check the ones that you already do!*

**#1 - Protect Personal Information**

*Do you have Policies and Practices in place make sure that renter records are secure, kept confidential, and protected against unauthorized access? The Gramm-Leach-Bliley Act (“GLB Act”) requires that you protect nonpublic personal information collected about renters. The FTC handles all complaints about the GLB Act and it is very easy for renters to submit complaints online.*

**#2 - Prevent Against Identity Theft**

*Do you have a written identity theft prevention program in place as required by the FTC’s Red Flags Rule?*

**#3 - Protect Social Security Numbers**

*The Social Security Act requires that anyone who has or had access to social security numbers shall keep them and any related records confidential and shall not disclose them.*

**#4 - Post Privacy Policies on Your Website**

*Every state’s law differs in what is required. However, not posting a Privacy Policy in many states may make Property Managers subject to civil suits for unfair business practices.*

**#5 - Give each Renter a Privacy Notice**

*Do you know what Privacy Notices must contain? The GLB Act requires that you provide each renter with a Privacy Notice at the beginning of the lease and each year that a renter continues to rent. This may be by mail, in-person delivery, or website posting. Simply posting the Privacy Notice on a wall is not allowed.*

**#6 - Protect Credit File Information**

*What steps do you take to protect credit file information? The Fair Credit Reporting Act prohibits you from disclosing information from a renter’s credit file to 3<sup>rd</sup> parties, without the renter’s consent. If this happens, a renter may sue a property manager for actual and statutory damages.*

**#7 - Securely Dispose of Renter Info**

*Do you know the reasonable security measures to take when disposing of renter information? How about the information that you store electronically? The FTC’s Disposal Rule requires you to take “reasonable measures” when disposing of renter information in order to protect against unauthorized access or use of the information. Your state laws may have additional requirements.*

**#8 - Have a Written Security Plan**

*The FTC’s Safeguards Rule requires you to have written security measures in place to safeguard renter information. You must also make sure that your affiliates and any 3<sup>rd</sup> party servicers safeguard renter information.*

**#9 - Know Response to Security Breach**

*Most state laws require that you take certain steps to promptly notify your renters and some even require that you notify the Attorney General. Failure to notify can result in civil fines or penalties, as well as lawsuits alleging damages resulting from a breach.*

**#10 – Have Social Media Policies**

*Do you have employees that use social media such as Facebook, Twitter, LinkedIn, and MySpace? Do you allow employees to discuss the company and/or post company-owned content on their personal social media accounts? Do you monitor and review social media usage on a regular basis to protect against unauthorized disclosure of your company’s information?*

**\*\*\* If You Want Help to Fill In the Blanks:  
contact [Cristina@PrivacyGurus.com](mailto:Cristina@PrivacyGurus.com)**



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