



Consumer Privacy Policy

Champlain Housing Trust (CHT) is a non-profit housing organization subject to the laws of the State of Vermont. CHT values the trust of its customers and is committed to the responsible management, use and protection of personal information. This notice describes the HomeOwnership Center's policy for the collection and disclosure of your information. We are entrusted with sensitive non-public information about you and your finances and uphold strict confidentiality procedures within our organization. We do not now, nor have we ever, sold or rented your non-public personal information to any non-affiliated third party for any reason.

What information we collect: We may collect "non-public personal information" which could include but is not limited to items such as your social security number, household income, payment history, and account balances. This information is collected in order to provide homebuyer education, individual counseling, shared equity grants and services, financing options, and loans.

The following are sources we may obtain information from:

- Information you provide to us, on applications and other eligibility or loan related documents
- Information we receive from third parties such as credit bureaus, employers or other income sources, institutions with which you have deposited funds or that have extended you credit
- Information about your transactions with us, our affiliates, or others

What Information We Disclose: We may share information under the law about our experiences or transactions with you or your account (such as your account balance and payment history with us) with companies related to us by common control or ownership ("affiliates"). However, where state law may be more restrictive, we will abide by the more restrictive requirements.

In order to expedite processing of our services on your behalf, CHT may need to disclose non-public personal information about you to "non-affiliated third parties" (that is companies not related to us by common control or ownership) and **will do so only with a signed authorization to release information from you**. These entities may include: attorneys, other lending entities, CHT funding sources as required, government-funded programs and/or service providers, or other government entities; and when required by law or in response to subpoenas; and to reputable credit reporting agencies via servicers ("credit bureaus"). We also may share information with other funding programs in order to combine different sources of loans and/or grants to help address your housing needs. Finally, in order to remain compliant with funders requirements, CHT may be required to allow funders such as (but not restricted to) HUD, NeighborWorks America, CHAPA and/or NFMC to engage in a review process that may include reviewing electronic and/or hard copy files.

If the HomeOwnership Center shares information with any non-affiliated third party, we will require their agreement to protect the confidentiality of customer information and use it only for the specific purpose intended and not reuse, sell, rent, or disclose it in any other form to any other entity. We will continue to adhere to the privacy policies and practices described in this notice whether or not we find you eligible for our program, or if you pay off your loan with us.

Our Security Procedures: We will always maintain control over the confidentiality of our customer information, which includes having physical, electronic and procedural safeguards that comply with federal standards. We will permit only authorized employees, who are trained in the proper handling of our customers' sensitive non-public information, to have access to that information in order to provide you with quality products and superior service. All of our operational and data processing systems are in a secure environment that protects your information from being accessed by third parties. Thank you for your confidence in Champlain Housing Trust and the HomeOwnership Center and for allowing us to help meet your housing needs.

HEADQUARTERS 88 King Street, Burlington, Vermont 05401 | P: 802.862.6244 | F: 802.862.5054

FRANKLIN/GRAND ISLE 13 Lake Street, St. Albans, Vermont 05478 | P: 802.527.2361 | F: 802.527.2373

WWW.GETAHOME.ORG

WWW.CHAMPLAINHOUSINGTRUST.ORG

THIS ORGANIZATION IS AN EQUAL OPPORTUNITY
EMPLOYER AND PROVIDER





Conflict of Interest Statement

Champlain Housing Trust (CHT) is a non-profit housing organization subject to the laws of the State of Vermont. CHT values the trust of its customers and is committed to fair and professional relationship. This notice describes the HomeOwnership Center's policy to avoid conflicts of interest.

CHT has clear protocols and policies in order to avoid conflicts of interest which include a limit on gifts that can be received by staff, a requirement to not engage in any activity that would result in personal gain to an employee and his/her relative, and a prohibition against preferential treatment of organizations or individuals. Where applicable, CHT's standard is to offer at least three options of lenders, Realtors®, inspectors, attorneys and contractors when providing resources to our customers and clients.

CHT's personnel policy for Conflict of Interest reads:

All employees must avoid engaging in any activity that could create a conflict of interest or the appearance of a conflict of interest. A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in personal gain for the employee or an immediate family member as a result of CHT's business dealings. A conflict may also arise if an employee engages in activity that has an adverse impact on the ability of CHT to carry out its mission in an efficient, effective manner. It is impossible to relate all of the situations that may cause or give the appearance of a conflict for CHT, but the following is an example of the type of prohibited conduct that may create an actual or potential conflict:

- Acceptance of gifts, money, discounts, or gratuities of a value greater than \$25 from any person or entity doing business or seeking to do business with CHT, particularly if the item is not offered to the general public.

Additionally, the HomeOwnership Center has added specific language pertaining to customers' rights to pursue resources, which reads:

Champlain Housing Trust's HomeOwnership Center provides home education and counseling (including financial literacy, rental, pre-purchase, delinquency & foreclosure mitigation and post-purchase), Shared Equity grants and assistance as well as home repair loans. HomeOwnership staff may discuss resources outside of CHT to address your situation; these may include housing agencies or programs, lenders, Realtors®, home inspectors, attorneys, contractors and other specific resources as appropriate. A customer is under no obligation to engage these other resources nor is a customer restricted to only these resources. It is important to note that Champlain Housing Trust encourages our customers and clients to engage in your own research to evaluate and choose resources that best suit your needs. Customers/clients are responsible for choosing resources.

Further, all CHT services are provided at will and any customer has the right to refuse services provided by CHT; a customer may withdraw from CHT services at any time. If you have any questions regarding these rights please feel free to speak with the Program Manager or the Director of HomeOwnership.

We thank you for your confidence in Champlain Housing Trust and the HomeOwnership Center and for allowing us to help meet your housing needs.