

## **Healthcare Trust of America, Inc. Privacy Policy Notice**

This Privacy Policy Notice explains how and why we collect, use, protect and, in certain cases, share your non-public personal information with affiliated and non-affiliated third parties.

“Non-public personal information” is personally identifiable financial information as well as any list, description or other grouping of consumers (and publicly available information pertaining to them) derived from any personally identifiable financial information that is not publicly available.

### **Categories of Non-Public Personal Information We Collect**

We may collect the following types of non-public personal information about you:

- *Customer-Provided Identifying Data.* We may collect information about you from applications, subscription agreements or other forms that you complete. Types of information we collect in this manner may include your name, social security number, driver’s license or government-issued identification card number, passport number, phone number, address, e-mail address, date of birth, occupation and financial information about your assets and income.
- *Transactional Information.* We may collect information about your transactions with us, our affiliates and non-affiliated third parties. Types of transactional information we collect in this manner may include your account numbers, account balances, transaction details and other financial information.
- *Information from Third Parties.* We may obtain information about you from third parties, such as broker-dealers, financial advisors, IRA and other ERISA custodians, joint account owners and consumer credit reporting agencies.

### **Why We Collect Non-Public Personal Information**

We may use your non-public personal information internally for our everyday business purposes. For example, we may use your information to verify your identity, evaluate whether you meet the applicable suitability standards for investing in our company, establish and maintain your account, process your transactions, provide you with services, resolve disputes, prevent fraud, communicate and share information with your broker/dealer, financial advisor, IRA custodian, joint owners and other similar parties acting at your request and on your behalf, and meet our obligations under the laws and regulations that govern us.

### **Persons to Whom We May Disclose Information**

Without your consent, we will not share any of your non-public personal information with anyone, except as described below. In order to better serve your investment needs and to suggest services or educational materials that may be of interest to you, as permitted by law, we may

share the types of information described above with certain of our affiliates that are non-financial companies, including our operating partnership and other subsidiaries.

We may also share this information, as permitted by law, with the following types of non-affiliated third parties:

- *Service Providers for Processing and Servicing Your Transactions.* We may share your non-public personal information with non-affiliated third parties, including financial service providers and non-financial companies, as necessary to carry out and administer a transaction that you authorize, to provide a service that you authorize, or to maintain or service your account. These non-affiliated third parties may include, for example, companies that serve as our transfer agent or provide data storage, check printing or other processing services.
- *Special Cases.* We may share non-public personal information with other non-affiliated third parties in limited circumstances as permitted by law. For example, we may share your information to protect the confidentiality or security of our records, to protect against or prevent actual or potential fraud, unauthorized transactions, claims, or other liability, or to resolve consumer disputes or inquiries. We may also share your information with certain insurance rate advisory organizations, our attorneys, our accountants, law enforcement agencies and consumer credit reporting agencies. In addition, we may share your information in order to comply with applicable legal requirements or in response to the judicial process.

We will not share your non-public personal information with non-affiliated third parties for the purpose of marketing financial products or services to you.

### **How We Protect Your Non-Public Personal Information**

We have policies and procedures that establish administrative, technical and physical safeguards to ensure the security and confidentiality of your non-public personal information in accordance with this Privacy Policy Notice. We also restrict access to your non-public personal information to those employees who have a legitimate business purpose for accessing the information.

### **Former Customers**

When you are no longer a customer, we may continue to use and share your non-public personal information as described in this Privacy Policy Notice.

### **Keeping You Informed**

We will send you a copy of this Privacy Policy annually. We will also send you all changes to this Privacy Policy as they occur.