Effective Date: February 1, 2014

# USA Title of Alabama, Inc Privacy Policy Notice

USA Title of Alabama, Inc ("USA Title") respect the privacy and security of your non-public personal information ("Personal Information") and protecting your Personal Information is one of our top priorities. The Privacy Statement explains USA Title's privacy practices, including how we use the Personal Information we receive from you and from other specified sources, and to whom it may be disclosed. USA Title follows the privacy practices described in this Privacy Statement and, depending on the business performed, USA Title Company may share information as described herein.

## **Personal Information Collected**

We may collect Personal Information about you from the following sources:

- Information we receive from you on applications, or other forms such as your name, address, social security number, tax identification number, asset information, and income information;
- Information we receive from you through our Internet websites, such as your name, address, email address, Internet Protocol address, the website links you used to get to our websites, and your activity while using or reviewing our websites;
- Information about your transactions with or services performed by us, our affiliates or others, such
  as information concerning your policy, premiums, payment history, information about your home or
  other real property, information from lenders and other third parties involved in such transaction,
  account balances, and credit card information; and
- Information we receive from a consumer or other reporting agencies and publicly recorded documents.

#### **Disclosure of Personal Information**

We may provide your Personal Information (excluding information we receive from customer or other credit reporting agencies) to various individuals and companies, as permitted by law, without obtaining your prior authorization. Such laws do not allow consumers to restrict these disclosures. Disclosures may include, without limitation, the following:

- To insurance agents, brokers, representatives, support organizations, or others to provide you
  with services you have requested, and to enable us to detect or prevent criminal activity, fraud,
  material misrepresentation, or nondisclosure in connection with an insurance transaction;
- To third-party contractors or service providers for the purpose of determining your eligibility for an insurance benefit or payment and/or providing you with services you have requested;
- To an insurance regulatory authority, or a law enforcement or other government authority, in a civil connection with a subpoena or a government investigation;
- To companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements and/or
- To lenders, lien holders, judgment creditors, or other parties claiming an encumbrance or an interest in title whose claim or interest must be determined, settled, paid or released prior to a title or escrow closing.

We may also disclose your Personal Information to others when we believe, in good faith, that such disclosure is reasonably necessary to comply with the law or to protect the safety to our customers, employees, or property and/or to comply with a judicial proceeding, court order, or legal process.

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<u>Disclosure to Affiliated Companies</u> - We are permitted by law to share your name, address and facts about your transaction with those title insurance underwriters who are licensed and actively appoint USA Title to provide you with services you have requested, for marketing or product development research, or to market products or services to you. We do not, however, disclose information we collect from consumer or credit reporting agencies with our affiliates or others without your consent, in conformity with applicable law, unless such disclosure is otherwise permitted by law.

<u>Disclosure to Nonaffiliated Third Parties</u> - We do not disclose Personal Information about our customers or former customers to nonaffiliated third parties, except as outlined herein or as otherwise permitted by law.

### Confidentiality and Security of Personal Information

We restrict access to Personal Information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard Personal Information.

#### Access to Personal Information/

# Requests for Correction, Amendment, or Deletion of Personal Information

As required by application law, we will afford you the right to access your Personal Information, under certain circumstances to find out whom your Personal Information has been disclosed, and request certain correction or deletion of your Personal Information. However, USA Title's current policy is to maintain customers' Personal Information for no less than your state's required record retention requirements.

For your protection, <u>all requests made under this section must be in writing and must include your notarized signature to establish your identity.</u> Where permitted by law, we may charge a reasonable fee to cover the costs incurred in responding to such requests. Please send requests to:

Chief Privacy Officer USA Title of Alabama, Inc 3829 Lorna Road, Suite 322 Birmingham, AL 35244

#### **Changes to this Privacy Statement**

This Privacy Statement may be amended from time to time consistent with applicable privacy laws. When we amend this Privacy Statement, we will post a notice of such changes on our website. The effective date of this Privacy Statement, as stated above, indicates the last time this Privacy Statement was revised or materially changed.