# McBride Richardson & Gullion, P.C.

First American Title Insurance Company Stewart Title Guaranty Company **Chicago Title Insurance Company** 

## **Privacy Policy**

## We Are Committed to Safeguarding Client/Customer Information

In order to better serve your needs now and in the future, we may ask you to provide us with certain private information or non-public information (NPI). We understand that you may be concerned about what we will do with such NPI, particularly any personal or financial information. We agree that you have the right to know how we will utilize the NPI you provide us with. We have adopted this Privacy Policy to govern the use and handling of your NPI, and this policy is in substantial conformity with the privacy policies of First American Title Insurance Company and Stewart Title Guaranty Company as provided to us, and in conformity with TILA-RESPA Final Rule and Consumer Protection Bureau Bulletin 2013-2, as now existing or hereafter amended.

## **Applicability**

This Privacy Policy governs our use of the NPI that you provide to us. It does not govern the manner in which we may use information we have obtained from public records or that is otherwise available to the public.

## **Types of Information**

Depending upon which of our services you are utilizing, the types of NPI that we may collect include:

- Information we receive from you on applications and in other communications to us, whether in writing, in person, by telephone or by any other means, including but not limited to birth date, address, Social Security Number;
- Information about your transactions with us, our third party service providers, or others;
- ♣ Information we receive from a consumer reporting agency;
- Information we receive from your mortgage lender or financial service provider;
- ♣ Information we receive from your real estate agent/broker.

#### **Use of Information**

We request NPI from you for our own legitimate business purposes necessary to conduct our business. We will not release your NPI except: (1) as necessary for us to provide the product or service you have requested of us; or (2) as permitted by law. We may, however, store such NPI, including the period after which any customer relationship has ceased. Such information may be used for any internal purpose, such as quality control efforts or customer analysis. We may also provide all of the types of NPI listed above to one or more of our service providers. Such service providers include financial service providers, such as title insurers, property and casualty insurers, IT service providers, and trust and investment advisory companies.

#### **Former Clients/Customers**

Even if you are no longer our client/customer, our Privacy Policy will continue to apply to you.

#### **Confidentiality and Security**

We will use our best efforts to ensure that no unauthorized parties have access to any of your NPI. We restrict access to NPI about you to those individuals and entities that need to know that information to provide products or services to you and only to those whom you have authorized by written Authorization to Release NPI. We will use our best efforts to train and oversee our employees to ensure that your NPI will be handled responsibly and in accordance with this Privacy Policy. We currently maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your NPI. We limit access to your NPI to employees who "need to know in order to perform the service you have requested." We require employees and all third party services providers to execute Confidentiality and Non-disclosure Agreements.