

# **PARK AVENUE TITLE AGENCY PRIVACY POLICY**

**Park Avenue Title Agency** values our customers' trust and is committed to the responsible management, use and protection of the information entrusted to us. In keeping with that philosophy the following privacy policy and disclosure outlines what nonpublic personal information we collect, how we protect nonpublic personal information, and how we share nonpublic personal information and the measures **Park Avenue Title Agency** takes to safeguard that information.

## **Information Collected**

In the normal course of business and to provide the necessary services to our customers, we may obtain nonpublic personal information directly from the customer, from customer-related transactions, or from third parties such as our title insurance agents, lenders, appraisers, surveyors or other similar entities.

## **Who is Covered**

Our Privacy Policy applies to each customer who purchases a **Park Avenue Title Agency** title insurance policy. Typically, this means that the customer is covered by our Privacy Policy at the closing of the real estate transaction.

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## **Access to Information**

Access to all nonpublic personal information is limited to those employees who have a need to know in order to perform their jobs. These employees include, but are not limited to, those in departments such as legal, underwriting, IT, claims administration, processing, examination, closing/escrow, and accounting.

## **Information Sharing**

It is the policy of **Park Avenue Title Agency** not to share nonpublic personal information that it collects with anyone other than our policy issuing agents as necessary to complete the real estate settlement services and issue the title insurance policy requested by our customer. **Park Avenue Title Agency** may share nonpublic personal information as permitted by law with entities with whom **Park Avenue Title Agency** has a joint marketing agreement. Entities with whom **Park Avenue Title Agency** has a joint marketing agreement have agreed to protect the privacy of our customer's nonpublic personal information by utilizing similar precautions and security measures to those that **Park Avenue Title Agency** uses to protect this information and only to use the information for lawful purposes. **Park Avenue Title Agency**, however, may share information as required by law in response to a subpoena, to a government regulatory agency or to prevent fraud.

## Information Security

**Park Avenue Title Agency** strives to maintain the confidentiality and integrity of the personal information in its possession and has instituted measures to guard against its unauthorized access. We maintain physical, electronic and procedural safeguards in compliance with federal standards to protect that information.

1. Physical Records
  1. Physical safeguards are in place that comply with federal regulations to guard non-public personal information about you that is maintained in hard copy. **Park Avenue Title Agency** maintains a Clean Desk Policy to reduce the threat of a security incident regarding NPI.
2. Information Systems
  1. Electronic files operate under a “lock out” system whereby three failed attempts to log-on results in shutdown; the system will only be re-enabled after verification of the user by security personnel;
  2. Logon identifications are issued only with specific access authorizations;
  3. Passwords must be changed every ninety days;
  4. Internal systems are regulated to ensure that only authorized **Park Avenue Title Agency** associates can access the information contained in the system;
  5. Website servers used to gather and transmit personal data are stored in a secure and environmentally controlled locations;
  6. The **Park Avenue Title Agency** website (www.parkavetitle.com and additional content-related websites), and certain other electronic files are encrypted;
  7. Monitoring systems and procedures are in place to provide warnings of possible attacks or intrusions into information systems; and
  8. Systems are equipped with response mechanisms that take appropriate action when unauthorized access to protected information is suspected or detected.
3. Employees
  1. Control procedures are in place together with the segregation of duties for employees with access to, or responsibility for, non-public personal information;
  2. Employees receive training, as part of the orientation process, with respect to **Park Avenue Title Agency**’s Privacy Policy and the issuance of the privacy notice; and
  3. Employees are required to execute an acknowledgement form following review of Park Avenue Title Agency’s Privacy Policy.
4. Agents
  1. Individuals, companies and other entities that access products and services from **Park Avenue Title Agency** must agree to safeguard nonpublic personal information about customers pursuant to **Park Avenue Title Agency** Privacy Policy.
5. Third Party Service Providers
  1. Third party service providers must agree to safeguard nonpublic personal information about customers pursuant to **Park Avenue Title Agency**’s Privacy Policy.

**We do not disclose any nonpublic personal information about you with anyone for any purpose that is not specifically permitted by law.**