

PRIVACY POLICY

Purpose

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about you with a non-affiliated third party unless the institution provides you with a notice of its privacy policies and practices, such as the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, we are providing you with this document, which notifies you of the privacy policies and practices of both Simple Title Closing and Escrow PLLC and Atlantic Coast Title Company LLC.

Types of Information Collected

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

- Information we receive from you or authorized representative such as on applications or other forms;
- Information about your transactions we secure from our files, our affiliates or others;
- Information that we receive from others involved in your transaction, such as the real estate agent, attorneys, or lender;
- 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 website, and your activity while using or reviewing our websites;
- Information we receive through publicly available internet searches and data available from the world wide web;
- Information we receive from the public records maintained by governmental entities that we either obtained directly from those entities, or from our affiliates, or others; and
- Information we receive from a consumer reporting agency.

We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information from unauthorized access and intrusion. We limit access to your nonpublic personal information only to those employees who need such access in connection with providing products or services to you for other legitimate business purposes.

Unless it is specifically stated otherwise in an amended Privacy Policy Notice, no additional nonpublic personal information will be collected about you.

Disclosure of Nonpublic Personal Information

We may disclose your nonpublic personal information with other real estate settlement service-related providers. We may also disclose nonpublic personal information to:

- Agents, brokers, representatives, 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;

- Third-party contractors or service providers who provide services or perform marketing or other functions on our behalf;
- Insurance regulatory authority, or a law enforcement or other governmental authority, in a civil action, in connection with a subpoena or governmental investigation;
- 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; and/or

In addition, we will disclose your nonpublic personal information when you direct or give us permission, when we are required by law to do so, or when we suspect fraudulent or criminal activities. We also may disclose your nonpublic personal information when otherwise permitted by applicable privacy laws such as, for example, when disclosure is needed to enforce our rights arising out of any agreement, transaction or relationship with you.

WE DO NOT DISCLOSE ANY NONPUBLIC PERSONAL INFORMATION ABOUT YOU WITH ANYONE FOR ANY PURPOSE THAT IS NOT SPECIFICALLY PERMITTED BY LAW.

Disclosure to Affiliated Companies

We are permitted by law to share your name, address and facts about your transaction with other Simple Title Closing and Escrow PLLC companies, agents, as well as other service providers 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 without your consent, in conformity with applicable law, unless such disclosure is otherwise permitted by law.

Disclosure to Non-affiliated Third Parties

We do not disclose personal information about our customers or former customers to non-affiliated third parties, except as outlined herein or as otherwise permitted by law.

Former Customers

Even if you are no longer our customer, our Privacy Policy will continue to apply. We may store such information indefinitely, including the period after which any customer relationship ceased. Such information may be used for an internal purpose, such as quality control efforts, auditing, marketing and customer analysis.

Confidentiality and Security

We will use our best efforts to ensure that no unauthorized parties have access to any of your information. We restrict access to nonpublic personal information about you to those individuals and entities who need to know that information to provide products or services to you. We will use our best efforts to train and oversee our employees and agents to ensure that your information 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 nonpublic personal information.