### **PRIVACY POLICY**

## INDIANA TITLE NETWORK COMPANY PRIVACY POLICY NOTICE

#### **PURPOSE OF THIS NOTICE**

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 nonaffiliated 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 Indiana Title Network Company.

# **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, mortgage broker, 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 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 our affiliates, such as insurance companies and other real estate settlement service providers. We may also disclose nonpublic personal information to:

- 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;
- 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;
- Others with whom we enter into joint marketing agreements for products and services that we believe you may find of interest.

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 affiliated companies, agents, and other real estate 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 with our affiliates or others without your consent, in conformity with applicable law, unless such disclosure is otherwise permitted by law.

## Disclosure to Nonaffiliated Third Parties.

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.

### **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 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 use our best efforts to train and oversee our employees and agents to ensure that your and entities who need to know that information to provide products or services to you. Such 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.

# **Information Obtained Through Our Web Site**

The Title Company is sensitive to privacy issues on the Internet. We believe it is important to us that you know how we treat the information about you that we receive on the Internet.

In general, you can visit Indiana Title Network Company's web sites on the World Wide Web without telling us who you are or revealing any information about yourself. Our Web servers collect the domain names, not the e-mail addresses, of visitors, unless specifically requested.

This information is aggregated to measure the number of visits, average time spent on the site, pages viewed and similar information. The Title Company uses this information to measure the use of our site and to develop ideas to improve the content of our site.

There are times, however, when we may need information from you, such as your name and email address. When information is needed, we will use our best efforts to let you know at the time of collection how we will use the personal information. Usually, the personal information we collect is used only by us to respond to your inquiry, process an order or allow you to access specific account/profile information. If you choose to share any personal information with us, we will only use it in accordance with the policies outlined above.

#### Links to Other Websites

The Title Company site and its affiliates' sites may contain links to other Web sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. If you choose to link to websites not controlled by Indiana Title Network Company, we are not responsible for the privacy or security of these sites, including the accuracy, completeness, reliability or suitability of their information. If you are asked to

provide information on one of these websites we strongly urge you to carefully study their privacy policies before sharing your information.

### Cookies

Some of The Indiana Title Network Company's web sites may make use of "cookie" technology to measure site activity and to customize information to your personal tastes. Cookies are pieces of information stored directly on the computer you are using. The Title Company may place cookies or similar files on your hard drive for security purposes, to facilitate site navigation and to personalize your experience while visiting our site. Cookies allow us to collect technical and navigational information, such as browser type, time spent on our site and pages visited. Cookies and other technologies provide us the capability to monitor the use of our site so we can continually improve the design and functionality to better serve you. Cookies and similar files do not contain or capture unencrypted personally identifiable data.

If you do not accept these cookies, you may experience some inconvenience in your use of some online products.