

# Michigan Bankers Title of West Michigan, L.L.C.

## Privacy Policy

### Table of Contents

- I. Disclosure of Customer Information
  - II. Collection, Retention and Use of Information
  - III. Maintenance of Accurate Information
  - IV. Employee Access to Information and Enforcement
  - V. Internet Information
- 

### **I. Disclosure of Customer Information**

Michigan Bankers Title of West Michigan, L.L.C. (Agency) will not disclose any nonpublic personal information (hereafter referred to as customer information) about our customers or former customers to anyone, except as permitted by law.

Customer information will only be disclosed to authorized persons, and only after identification has been verified. Verifying information may include Social Security Number, date of birth, signature and/or other identifying information. If the information request is made by telephone call and we are uncertain about the identity of the person requesting the information, we will ask that the request be made in writing or in person.

Agency employees will not share personal or financial information with nonaffiliated third parties except when legally required (in order to comply with federal or state laws/regulations and government or court orders) or when legally permitted to service the customer's interest.

Examples are as follows:

- Where it is necessary to complete a transaction initiated by the customer.
- In order to report the existence and condition of an account to companies such as credit bureaus or merchants.
- In order to comply with government or court orders.
- If we have the written permission of the customer.

Agency will provide certain customer information to nonaffiliated third party companies that we hire to provide us operational support. These nonaffiliated third party companies provide services that allow us to complete transactions.

Agency will not knowingly do business with any nonaffiliated third party provider or company that uses or sells this information for marketing purposes.

Agency may share with our affiliates, at our discretion, information regarding both current and historical transactions and experiences with you.

### **II. Collection, Retention and Use of Information**

Agency collects nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;

- Information about your transactions with us, our affiliates, or others; and
- Information we receive from a credit reporting agency.

Agency will only collect information as we believe is reasonably useful in administering our business and to provide products, services, and other opportunities to you, our customer.

### **III. Maintenance of Accurate Information**

Agency will correct known inaccurate information in a timely manner.

### **IV. Employee Access to Information and Enforcement**

All Agency employees are educated on the importance of confidentiality and customer privacy. They are thoroughly trained to learn and follow the Agency Privacy Policy. Employees with access to customer information are required to adhere to the Privacy Policy.

- Any employee that violates the Privacy Policy will be subject to disciplinary measures (warnings, reprimands, suspensions) and possible termination of employment.
- Employees of Agency will only have access to customer information on a need-to-know basis. We maintain physical electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

### **V. Internet Information**

Agency recognizes the trust you have placed in us and the related responsibility we have regarding your financial privacy. It is Agency's responsibility to keep your sensitive financial and personal information confidential. Agency has always had formal procedures to help protect your privacy.

With the surge in Internet use, it has become even more crucial that steps are taken to assure you that your private information remains private. Agency Privacy Policy include: a) website security, b) website privacy and c) control over your personal information.

#### **A. Website Security**

Agency has implemented technology to assure you that any sensitive personal information you provide us or any account information you receive on-line is managed in a safe and secure manner.

Additionally, procedures have been implemented to assure you that only authorized Agency employees may view the information you share. This is accomplished by limiting access to that information (via access capability and password control) to only those employees having a legitimate business purpose for viewing your information and responding to your inquiries.

#### **B. Website Privacy**

The Agency site includes sections that are public and areas that are password protected.

When any person visits the public areas of the website, certain basic information may be collected, such as how many people visited the site and what pages were visited.

Unlike the personal information that you provide and view (which is subject to the security procedures described above), all of the information gathered in the public areas of the website is general. This general information is used to determine which parts of the Agency website are most popular and how people access them. The information gathered will help improve the content in the web-related pages and assist Agency in our continuing efforts to improve service to all customers.

Also included in the Agency website is the capability for you to correspond with the Agency. This correspondence may be for the purpose of asking general questions, requesting literature or responding to other promotions. E-mail addresses from those who correspond with Agency are collected, along with any other information you provide, for example site registration or survey information.

Whether or not you are a customer of Agency, personal information will be collected from you if, and only if, you voluntarily provide that information. The Agency Privacy Policy prohibits any sale or rental of customer information to any nonaffiliated third party for marketing purposes.

### C. Control of Your Personal Information

Agency will not share information with any third parties other than as required by law, regulation or contractual obligations. Consequently, you will not receive information from another company as a result of your relationship with Agency. If you provide Agency with your postal address, you may receive periodic mailings from Agency with information on products, services, or upcoming events. Agency encourages you to request any marketing information that interests you from us.

### **FURTHER INFORMATION REGARDING AGENCY PRIVACY POLICY**

This statement addresses our policies on Internet information and internal customer information. Additional inquiries or comments should be addressed to:

Michigan Bankers Title of West Michigan, L.L.C.  
Attn: Privacy Policy  
507 S. Grand Avenue  
Lansing, Michigan 48933