


# Customer Privacy Statement

	<b>Policy &amp; Procedure Manual</b> <b>HOME SECURITY ABSTRACT &amp; TITLE CO.</b>
Home Security Abstract & Title Co.	Document: Customer Privacy Statement
564 Dodge Ave., Elk River, MN 55330	Effective Date: 1-Aug-14
900 S. Rum River Dr., Princeton, MN 55371	
1012 5th St. SE., Milaca, MN 56353	Pages: 5

## 1. Purpose

This privacy statement is designed to inform individuals who intend to or are doing business with Home Security Abstract & Title Co. about the company's policies and practices regarding the handling of personal information. The statement is to be conspicuously posted wherever Home Security Abstract & Title Co. collects personal information, either in digital or printed form.

## 2. Scope

This privacy statement covers all collection, use, storage, sharing and maintenance of customer personal information in all forms.

## 3. Privacy Statement

Effective Date: 1-Aug-14

### Home Security Abstract & Title Co. Privacy Statement

Home Security Abstract & Title Co. and its subsidiaries ("We or Us") respect the privacy and security of your Personal Information (PI). We are committed to respecting and protecting your Personal Information in all of our operations. We use safeguards to protect your privacy and confidentiality. This Privacy Statement discusses information we collect and the manner in which it is used, including how we use your Personal Information and to whom it may be disclosed.

#### Collecting Personal Information

We may collect Personal Information about you from the following sources:

- Information we receive from you on applications or other forms, such as your name, address, social security number, tax identification number, asset information, and income information
- 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 websites, and your activity while using or reviewing our websites
- Information about your transactions with or services performed by us, our affiliates, or others, such as information concerning your policy,

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premiums, payment history, information about your home or other real property, information from lenders and other third parties involved in such transaction, account balances, and credit card information; and

- Information we receive from consumer or other reporting agencies and publicly recorded documents.

We may collect your Personal Information when you send an email message, such as an inquiry, and we will use that information to respond to your inquiry. Please keep in mind that email cannot be guaranteed to be secure from interception or other disclosure. You should not send communications that contain sensitive PI such as bank account numbers, charge card accounts or social security numbers in email unless in encrypted form. Our website uses encryption whenever we collect sensitive PI.

## **Disclosures of Personal Information**

We may provide your PI (excluding information we receive from consumer or other credit reporting agencies) to various individuals and companies, as permitted by law, without obtaining your prior authorization. These laws do not allow consumers to restrict these disclosures.

Disclosures may include, without limitation, the following:

- 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 application or transaction;
- To third-party contractors or service providers for the purpose of determining your eligibility for a product or service or payment and/or providing you with services you have requested;
- To a regulatory authority, or a law enforcement or other governmental authority, in a civil action, in connection with a subpoena or a governmental investigation;
- To companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements; and/or
- To 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.

We may also disclose your Personal Information to others when we believe, in good faith, that such disclosure is reasonably necessary to comply with the law or to protect the safety of our customers, employees, or property and/or to comply with a judicial proceeding, court order or legal process.

## **Disclosures to Affiliated Companies**

We are permitted by law to share your name, address and facts about your transaction with other Home Security Abstract & Title Co. companies, such as insurance 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.

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## Disclosures 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.

## Personal Information Confidentiality and Security

We restrict access to Personal Information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard Personal Information.

## Access to Personal Information

You have the right to access your Personal Information, as is reasonable and appropriate, to find out to whom your Personal Information has been disclosed.

## Requests for Correction, Amendment, or Deletion

You may request correction or deletion of your Personal Information. However, our current policy is to maintain customers' Personal Information for no less than your state's required record retention requirements for the purpose of handling future claims.

For your protection, all requests made under this section must be in writing and must include your notarized signature to establish your identity. Where permitted by law, we may charge a reasonable fee to cover the costs incurred in responding to such requests. Please send requests to:

President
Home Security Abstract & Title Co.
900 So. Rum River Drive
Princeton, MN 55371
763-389-9090

## Branded or Co-Sponsored Websites

If you provide Personal Information to us through a co-branded or co-sponsored website, you may be providing such information to the co-sponsor as well. In that event, we will make reasonable efforts to provide notice to you at the time you provide the information and you can decide whether you wish to provide your PI. If you do submit your PI on a co-sponsored website, we will not be responsible for the co-sponsor's use of the information you submit.

## Links to Other Websites

Our websites may contain links to websites that are provided and maintained by third parties and that are not subject to this Privacy Statement. Please review the privacy statements on those websites carefully. We make no representations concerning and are not responsible for any such third party websites or their privacy policies or practices.

## Cookies and Tracking Technologies

Our websites may use "cookies" or similar technologies to improve our service to you. We may automatically collect your browser type and version, your Internet domain, your IP address (automatically assigned to your computer whenever you are

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surfing the web), and the date and time you access our sites, and the pages you visit.

Your browser can most likely be configured to notify you when cookies will be received and offer you the option of refusing cookies. If you reject cookies, you may still use our websites, but your ability to use some areas may be limited.

## **Changes to this Privacy Statement**

This Privacy Statement may be amended from time to time consistent with applicable laws and regulations. When we amend this Privacy Statement, we will post a notice of such changes on our website. The effective date of this Privacy Statement, as stated above, indicates the last time this Privacy Statement was amended or materially changed.

## **4. Authority and Policy Interpretation**

The office of the TITLE is responsible for this policy, including updates, revisions and implementation procedures. The office shall interpret the application of the policy and answer all inquiries about this policy. The office shall conduct a review and update of the policy at least annually.

## **5. Responsibilities**

All owners, managers, employees, contractors, service providers and third parties acting on behalf of Home Security Abstract & Title Co. are responsible for complying with the requirements of this Privacy Statement.

## **6. Procedures and Supporting Tasks**

This Privacy Statement shall be posted in a conspicuous way on all websites and pages that collect or display Customer Personal Information.

This Privacy Statement, not including the sections "Branded or Co-Sponsored Websites", "Links to Other Websites", and "Cookies and Tracking Technologies", shall be posted in print form in public areas of Home Security Abstract & Title Co. facilities. The posting shall be prominent and easily seen by visitors.

## **7. Records Management**

This policy shall be regularly maintained and posted to be readily accessible for all employees, contractors and temporary employees in print and digital forms.

## **8. Revision History Information:**

This policy shall be reviewed and updated at least annually.

Revision Date:

Revision Author:

Approval Process w/Dates:

Effective Date of Revised Policy:

*Description of reasons for revisions and changes made*

## **9. Related Documents**

[Customer Privacy Policy](#)

[Information Security and Protection Policy](#)

[Information Security for Third Parties](#)

[Security Breach Incident Management](#)