

America's One Title Agency, Inc.
Corporate Privacy Policy Statement

America's One Title Agency, Inc. and its subsidiaries ("AOT") respect the privacy and security of your non-public personal information ("Personal Information") and protecting your Personal Information is one of our top priorities. This Privacy Statement explains AOT's privacy practices, sources, and to whom it may be disclosed. AOT follows the privacy practices described in this Privacy Statement and, depending on the business performed, AOT companies may share information as described herein.

Personal Information Collected

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

- Information we receive from you on applications or other form, 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 our services performed by us, our affiliates, or others, such as information concerning your policy, 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.

Disclosure of Personal Information

- We may provide your Personal Information (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. Such laws do not allow consumers to restrict these disclosures. Disclosures may include, without limitation, the following:
- To insurance 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;
- To third-party contractors or service providers for the purpose of determining your eligibility for an insurance benefit or payment and/or providing you with services you have requested;
- To an insurance 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 assignments 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.

America's One Title Agency, Inc.
Privacy Statement

Disclosure to Affiliated Companies

We are permitted by law to share your name, address and facts about your transaction with other AOT companies, such as insurance companies, agents, and 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 non affiliated third parties, except as outlined herein or as otherwise permitted by law.

Confidentiality and Security of Personal Information

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.

The Company has a formal privacy and information security program that is appropriate with the size and complexity, the nature and scope of the Company's activities and the sensitivity of the information in the Company's possession. As part of this program, The Company maintains a Privacy Policy Notice (see attached) that is posted on The Company's website and provided to customers and consumers for each order processed. Additional information about The Company's privacy and information security program is available to consumers and customers upon request.

The Company policies associated with the privacy and information security program are given to all employees and the employees must acknowledge in writing that they have read and understand such policies. It is the responsibility of the President to ensure The Company has received all employee acknowledgements.

The Company makes an assessment annually of the standards and requirements affiliated with The Company's information security program, including those set out in this policy and procedure document. This assessment is conducted by the President and IS Manager.

Physical Security of Non-Public Information (NPI)

The Company utilizes an information provider for background and credit checks. The Company individuals who have access to NPI is restricted to authorized principals and employees who have undergone a formal background check and credit report process which identified no irregularities.

Removable media devices, including but not limited to external hard drives, compact discs, magnetic tapes and USB/flash drives are issued by the Company with the approval of President or IS Manager. The use of removable media devices is prohibited unless President or IS Manager has authorized such use. Removable media is kept in a secure area.

Other standard procedures for security of NPI include closing paper files other than the one currently being worked on, stow files away when away from workspace and lock offices and file cabinets at the end of the day. Hardcopy NPI that is transmitted outside The Company is done so using only secured envelopes and/or locked document bags.

America's One Title Agency, Inc.
Privacy Statement

Network Security of Non-Public Information (NPI)

At the direction of the President, the Company's designated Network Administrator(s) grants appropriate access to The Company's various computer technology applications. The Company's file server(s) or main central processing unit is in secured area within the corporate offices. The Company's computer network utilizes up-to-date anti-virus and anti-spyware software applications. The Network Administrator is responsible for such software maintenance.

Access to The Company's information technology computers and network is secured by individual and unique passwords. The Company utilizes a computer applications requires passwords to access server(s). All The Company's computers no mater, desktop or laptop run a "screen timeout" application causing automatic system sign off when the system detects no activity for a period of (5).

Disposal of Non-Public Information (NPI)

The Company has defined and communicated to employees the types of data/information that falls into the NPI category. Any NPI data is disposed of accordingly. Paper records are disposed of in locked shredding bins. Secure shredding bins provided by Shred-It can be found throughout the office(s). When disposing of computers and portable storage devices, The Company uses LCO, Inc. to erase/wipe clean the device(s).

Disaster Management Plan for Non-Public Information (NPI)

The Company has a documented disaster management plan to ensure adequate back-up, recovery and business continuation procedures. The plan also includes required procedures for notification and response to security incidents and breaches. (AOT Disaster Management Plan). The Company also maintains insurance coverage's such as commercial property insurance, business interruption coverage for such circumstances. The disaster management plan is reviewed on an annual basis by our President & IS Manager and updated as appropriate.

Security Practices of Independent Service Providers

If independent service providers for The Company receive NPI from The Company, The Company shares this policy document with the service provider and/or conducts appropriate due diligence of the NPI security measures of the service provider before transmitting any NPI data. Service providers are aware they must notify The Company regarding NPI security breaches of NPI data that has been transmitted.

If security breaches occur, proper notification is provided to consumers and law enforcement in accordance with The Company's privacy and information security program and disaster management plan.

Access to Personal Information

Requests for Correction, Amendment, or Deletion of Personal Information

As required by applicable law, we will afford you the right to access your Personal Information, under certain circumstances to find out to whom your Personal Information has been disclosed, and request correction or deletion of your Personal Information. However, AOT's 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 coverage claims.

Effective Date: 10/1/2013

America's One Title Agency, Inc.

Privacy Statement

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:

Chief Privacy Officer
America's One Title Agency, Inc.
2824 East Beltline Lane NE
Grand Rapids, MI 49525

Changes to this Privacy Statement

This Privacy Statement may be amended from time to time consistent with applicable privacy laws. 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 revised or materially changed.