

AMERICAN LAND TITLE CORPORATION
Commercial and Residential Settlement Agents
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Privacy and Data Security Policy

Purpose: Federal and state laws (including the Gramm-Leach-Bliley Act) require title companies to develop a written information security program that describes their procedures to protect non-public customer information. The program must be appropriate to the company's size and complexity, the nature and scope of the company's activities, and the sensitivity of the customer information the company handles. A company evaluates and adjusts its program in light of relevant circumstances, including changes in the firm's business or operations, or the results of security testing and monitoring.

Security Statement

American Land Title Corporation has taken measures to guard against unauthorized or unlawful processing of personal data and against accidental loss, destruction or damage.

This includes:

- Adopting an information security policy (this document is our policy)
- Taking steps to control physical security (e.g., title files and staff records are all kept in a locked filing cabinet)
- Putting in place controls on access to information (e.g., password protection on files and server access)
- Establishing a business continuity/disaster recovery plan (including, at a minimum taking regular back-ups of its computer data files and this is stored away from the office at a safe location)
- Training all staff on security systems and procedures
- Detecting and investigating breaches of security should they occur

Basic Principles

1. Access to data whether current or archived is provided to those individuals who, in the course of performing their responsibilities and functions, must use the specified data. Access is limited to authorized employees who have undergone background checks and credit reports at hiring, and every three years thereafter.
2. Personal data is to be collected only for the purpose specified.
3. Data collected is to be relevant but not excessive for the purposes required.
 - On an annual basis, title insurance application forms and any other forms that we use are reviewed to confirm that we are not asking for irrelevant information.
4. We are in compliance with federal law which requires companies that possess Non-public Personal Information for a business purpose to dispose of such information properly in a manner that protects against unauthorized access to or use of the information. Data is not to be kept for longer than is necessary for the purposes collected, including complying with applicable laws. Within 30 days of closing:
 - Files are scanned into our secure server and paper copies are shredded. All non-public Personal Information is shredded by **Pro-Shred**.
 - Files are moved to locked files in a secure location in our office.
5. We protect Non-public Personal Information transmitted via email through the use of secure email software (**Entrusted E-mail**), which encrypts data and restricts access to the information contained in the email.

6. We protect the data with appropriate technical and organizational measures to minimize the risk of unauthorized or unlawful processing and against accidental loss or destruction or damage to personal data.
 - Our network is password protected, thereby securing all Non-public Personal Information.
 - Servers are stored in locked facilities with access limited to authorized staff only.
 - Remote access to files is available to authorized staff only.
 - The servers and computers are disconnected from the internet during non-business hours.
7. Data is not removed from the office, except when contained on/within appropriately secured data transmission methods.
 - Paper files are at all times secure and are locked in a secure location when the ALTC office is closed.
 - Paper files are never removed from the office except as needed by a settlement agent for a remote closing.
 - Remote access is provided to our server for authorized employees only.
 - When access is provided, the following security measures are in place: It is a condition of remote access to the office network by staff that their home computers also have anti-virus software installed which is regularly updated with the latest virus definitions.
8. All data on the network is protected by Avast Anti-virus software that runs on workstations, and is updated automatically with on-line downloads from the Avast website. This includes alerts whenever a virus is detected.
9. Any viral infection is immediately investigated and addressed by information technology specialist, Pablo Jusem, Tenacity IT, with notification of the infection provided to American Land Title Corporation owner, Betsy Jiranek.
10. All user data is backed up to tape automatically on a daily basis, using an appropriately secure system for fast indexing and data restoration.
11. A full server backup to tape takes place weekly.
12. Daily and weekly backups are securely stored in a room remote from the server room and reused on a fortnightly basis.
13. All staff receives appropriate management and training of to ensure compliance with company's information security program.
14. American Land Title Corporation provides oversight of its IT service providers to ensure compliance with the company's privacy and data security program.
15. A separate business continuity/disaster recovery plan has been established.