

Privacy Policy

Below is a copy of the Company's Privacy Policy which is disseminated to all parties to an Escrow.

Re/Max Partners Real Estate, a Non-Independent Broker Escrow has prepared this Privacy Policy to comply with the Gramm-Leach-Bliley Act, Public Law 106-102 and to inform clients regarding its collection, storage and use of information that is received and disseminated during the processing of an Escrow. The information in this Privacy Policy applies to Escrow Holder's current and former clients.

1. Categories of Information Escrow Holder Collects: Escrow Holder collects Non-public Personal Information ("NPI") about clients from the following sources:
 - a. Information from the client in letters and other communications as well as in escrow instructions and on forms, including but not limited to the Statement of Information; and
 - b. Information directly from third parties including real estate sales agents and brokers, mortgages companies and lenders, title companies, contractors, bookkeepers and accountants, tax preparers, attorneys, notaries, contractors, homeowners associations, insurance agents, federal, state or local tax or governmental authorities, or from others who may give Escrow Holder information on forms or by other methods including but not limited to, telephone, e-mail, or facsimile transmission.

2. Categories of Parties To Whom Escrow Holder Discloses. Escrow Holder may disclose NPI about clients to the following types of third parties as necessary for the third party to provide information and/or documentation necessary for the completion of an Escrow:
 - a. Financial service providers such as title insurance and underwritten title companies, mortgage companies and lenders as well as insurance agents and companies associated with an Escrow;
 - b. Nonfinancial companies such as homeowners associations, attorneys, bookkeepers and accountants, federal state or local tax or governmental authorities, notaries, and real estate sales agents and brokers associated with an Escrow; and
 - c. Service providers including contractors, structural pest control operators, and others rendering services to the client or the real property or business that is the subject of this Escrow.

Otherwise, Escrow Holder does not disclose NPI to anyone outside the escrow company without the client's consent. Escrow Holder restricts access to information contained in escrow files to those employees who need to know that information as necessary to provide products or services to the client. Escrow Holder maintains physical, electronic and procedural safeguards that comply with state and federal regulations to guard client nonpublic personal information. Client information is stored in a secure place on a secure computer and in physical files. When Escrow Holder replaces computers, old disks are erased or reformatted before disposal. When Escrow Holder disposes of old physical paper files, they are shredded and/or recycled by a bonded security company.

Any questions regarding the policies set forth in this Privacy Policy should be directed to the Escrow Officer handling that Escrow.

Information Security Policy Management and Training

Compliance Officer shall review and maintain the Company's Information Security Policy and monitor compliance with the guidelines set forth in the Information Security Policy. Compliance Officer shall have authority to grant limited exceptions to the Information Security Policy on a case by case basis.

At least annually, the Company will conduct an assessment of all information security areas for potential risks and evaluate current precautions in place. The assessment will be performed by either a member of management with satisfactory technical expertise or by a third party professional in the information technology industry. Areas of assessment will include: changes in state or federal privacy laws, employee training and management; information systems, including network and software design; information processing, storage and disposal; detecting, preventing and responding to attacks, intrusions or other system failures. The Company will also audit a small portion of the Company's files to analyze whether the Company's employees are complying with the Company's Information Security Policies. The Company's Information Security Policy will be modified based upon the findings of these assessments. The results of the assessment will be documented and kept by management.

Every employee and vendor with access to NPI shall review the Company's Information Security Policy upon employment and annually thereafter, and shall acknowledge their agreement to abide by its terms.