

## **TITLE GUARANTY ESCROW SERVICES, INC.'S STATEMENT OF PRIVACY POLICY**

This Statement is provided to you as a customer of Title Guaranty Escrow Services, Inc. It applies to transactions involving individuals who are purchasing our services for primarily personal, family or household purposes.

We want you to know that we recognize and respect your privacy expectations and the requirements of federal and state privacy laws. Information security is one of our highest priorities. We recognize that maintaining your trust and confidence is the bedrock of our business. We maintain and regularly review internal and external safeguards against unauthorized access to non-public personal information ("Personal Information").

In the course of business, we may collect Personal Information about you from the following sources: from applications or other forms we receive from you, including communications sent through TGExpress; from your transactions with, or from the services being performed by us, our affiliates, or others; from a consumer reporting agency, if such information is provided to us in connection with your transaction; and from the public records maintained by governmental entities that we either obtain directly from those entities, or from our affiliates and non-affiliates.

Our policies regarding the Protection of the Confidentiality and Security of your Personal Information are as follows. We restrict access to all Personal Information about you to those employees who need to know that information in order to provide products and services to you. We maintain physical, electronic and procedural safeguards that comply with federal standards to protect your Personal Information from unauthorized access or intrusion. Employees who violate our strict policies and procedures regarding privacy are subject to disciplinary action. We regularly assess security standards and procedures to protect against unauthorized access to Personal Information.

Our policies and practices regarding the sharing of your Personal Information are as follows. We may share your Personal Information, consistent with applicable privacy laws, with affiliated companies and with others who are providing you with the services that you have requested. **WE DO NOT DISCLOSE ANY PERSONAL INFORMATION ABOUT YOU WITH ANYONE FOR ANY PURPOSE THAT IS NOT PERMITTED BY LAW.**

Consistent with applicable privacy laws, there are some situations in which Personal Information may be disclosed. We may disclose your Personal Information when you direct or give us permission; when we are required by law to do so, for example, if we are served with a subpoena or a court order; or when we suspect fraudulent or criminal activities. We also may disclose your Personal Information when otherwise permitted, for example, when disclosure is needed to enforce our rights arising out of any agreement, transaction or relationship with you.

Our policy regarding dispute resolution is as follows. Any controversy or claim arising out of or relating to our privacy policy, or the breach thereof, shall be settled by alternative dispute resolution with Dispute Prevention & Resolution, Inc or other Hawaii-based dispute resolution company.