

## 1ST PREFERENCE MORTGAGE CORPORATION ONLINE PRIVACY STATEMENT

1St Preference Mortgage Corporation and all other related affiliates and subsidiaries (collectively "1St Preference Mortgage") respects your privacy and values our relationship with you. This Online Privacy Statement (the "Privacy Statement") applies to our privacy practices for the handling of information relating to your use of the [statestreet.com](http://statestreet.com) website (the "Site") and our online services on the Site (the "Services"). This Privacy Statement describes the types of personal and anonymous online information that we collect when you access the Site, how we may process that information and with whom we can share it.

1St Preference Mortgage' goal is to provide you with a personalized Internet experience that delivers the information, resources, and services that are most relevant and helpful to you. To achieve this, we may collect personally identifiable information ("Personal Information") as well as anonymous information as you access and use the Services. Personal Information is information that can be used to uniquely identify you, such as your name, job title, telephone number and e-mail address and includes information that tells us what you do on the Site, such as functions utilized, searches conducted, the time of day you visited the Site without telling us who you are. Anonymous information is also collected about your browser, pixel tags and other technologies. Anonymous information is collected by most browsers, such as your Media Access Control (MAC) address, device type, screen resolution, operating system version and internet browser type and version. Any information gathered is confidential and is used in the delivery of the service you have requested and to allow 1St Preference Mortgage to improve the service and your online experience.

This Privacy Statement also describes the measures we take to protect the security of your information. We will not disclose or provide Personal Information about you to any third party for any purpose without your written consent, except as described in this Privacy Statement.

**Please read this online Privacy Statement carefully.** Your use of the Site or the Services, including your input of any Personal Information into the Site or into a laptop or other device used to log onto the Site ("Device"), is subject to and governed by this Privacy Statement. 1St Preference Mortgage may change this Privacy Statement at any time without prior notice to you. Any changes or updates will be effective immediately upon posting to the Site. *It is your responsibility to check the Privacy Statement each time you use the Site and/or the Services.* By accessing the Site or the Services, you agree to the collection, use and disclosure of Personal Information in accordance with the terms of this online Privacy Statement. The effective date of the Privacy Statement is indicated above.

This Privacy Statement supplements any other Privacy Statement that you may have received from 1St Preference Mortgage. This Privacy Statement applies only to the use of the Site and the Services.

## **COLLECTING AND USING INFORMATION**

When you visit and use the Site, information is collected from you automatically through the use of "cookies." Cookies are small data files that contain a unique identification number stored on your computer and are used by 1St Preference Mortgage and 1St Preference Mortgage' technology partners to remember the visitor. The Site sends cookies to your computer's browser to allow us to better understand who is visiting, either for the first time or as a return visitor. The cookies placed by our server are readable only by that server, just as any cookie placed by 1St Preference Mortgage' technology partners are readable only by the partner server providing the cookie. Cookies cannot access, read or modify any other data on a computer. All web browsers offer the option to refuse or delete a cookie.

When you fill out a web form or receive an e-mail from us, cookies are used to record your preferences for certain kinds of information as you navigate through the Site, to help us identify Site features in which you may have the greatest interest as well as for e-mail marketing purposes, and for measurement and analytics. This information helps us to customize the information on and delivery of our Site and direct marketing content, making them more useful to our visitors. The information collected through cookies typically is stored only for the length of time that you are connected to the Site. Certain information, however, may in some instances be stored in an encrypted cookie that lasts longer than the duration of the visit to the Site. It is important to note that cookies do not capture any information that can personally identify you or enable a third party to contact you via telephone, e-mail or postal mail.

The use of cookies is common on the Internet and many web browsers are initially configured to accept cookies automatically. If you would prefer not to accept cookies, you can set your browser to notify you when your computer is receiving a cookie or to refuse cookies automatically. To readjust your browser's cookie options, please refer to the instruction documentation of your particular browser, or seek online assistance.

## **TYPES OF PERSONAL INFORMATION WE MAY COLLECT**

1St Preference Mortgage or one of our service providers will collect Personal Information that you voluntarily provide when you elect to use some of our Services. For example, in order to access some of the Services, you will be required to input your 1St Preference Mortgage User ID or e-mail address. These Services are password protected. Accordingly, once you submit your user ID and password, 1St Preference Mortgage will recognize who you are and collect all information that you submit, including all electronic instructions (including all transaction information). Any information collected about you may be associated with other identifying information that we have about you or that is publicly available from other sources.

1St Preference Mortgage may collect information on certain technical information regarding your Device, such as the operating system, unique identifier, and model name of your Device, as well as its user configurations and settings. We may also collect information relating to your use of the Site and our Services.

The information that we collect enables 1St Preference Mortgage to provide you with access to the Site and the Services on your Device. 1St Preference Mortgage uses the information that it collects about and from you to offer you an enhanced, personalized online experience on your Device or our Site and third-party websites linked to our Site. We can use this information to better tailor and personalize our Services. We also use it to authenticate you as an authorized user and to facilitate communications between us that you request.

Other than the collection of information as described in this Privacy Statement, we will not collect Personal Information about you when you use the Site or the Services, unless you choose to directly provide such information to us when contacting us via email or other method. We will use your Personal Information to process your request and, when applicable, respond to you. By contacting us in this manner, you consent to the collection and the use of your Personal Information for purposes of responding to your request and in the support of services requested.

1St Preference Mortgage recognizes that certain jurisdictions have enacted laws that require higher protection of certain sensitive personally identifiable information, such as state or national ID numbers, or other information regarding racial or ethnic origin, political opinions, religious or political beliefs, trade-union membership, health or medical records, or criminal records ("Special Data"). 1St Preference Mortgage does not require such Special Data from you, and you should not input such information if someone asks you.

## HOW WE COLLECT INFORMATION

1St Preference Mortgage may periodically collect information from you through automated means when you use the Site or the Services.

- **Cookies.** Please see "Collecting and Using Information" section above.
- **Unique device identifiers.** When you access the Site or the Services, we may collect the unique identifier of the Mobile Device you use to connect to the Internet. This unique identifier helps to facilitate communications which you have elected to receive from us.
- **Information that you input.** 1St Preference Mortgage may also collect information that you key into the Device, such as your password and User ID. In addition, 1St Preference Mortgage may collect your

feedback and opinions (for example, through surveys) for business purposes, such as improving processes or user experience. You may respond to these surveys or elect not to respond.

## **'DO NOT TRACK' DISCLOSURE**

Do Not Track (DNT) is a technology feature that allows you to restrict tracking when browsing from site to site on the Web. When you choose to turn on the DNT setting in browsers that support this feature, the browser sends an automated browser signal to the web sites and other web services (such as analytics services, advertising networks, and social platforms) you encounter while browsing to prohibit tracking. At this time, 1St Preference Mortgage does not recognize automated browser signals regarding tracking mechanisms, such as "do not track" requests.

## **HOW WE USE AND SHARE PERSONAL INFORMATION**

The purposes for which your information may be processed include but are not limited to the following:

- 1St Preference Mortgage may use anonymous or Personal Information in order to operate our business in a prudent manner in accordance with industry standards and applicable law, which may include, in addition to supporting the Services; responding to inquiries and requests; fraud prevention; and monitoring and archiving communications.
- 1St Preference Mortgage may disclose or share nonpublic personal information about its customers to its affiliates, as permitted by law, in order for its affiliates to provide services. This may, where permitted by local law, include archiving your Personal Information in a jurisdiction other than your own, which may not have equivalent data protection laws.
- 1St Preference Mortgage may also share Personal Information with government agencies, exchanges, or other self-regulatory organizations and law enforcement authorities as required or permitted by law, rule, regulation or legal process, including, without limitation, for governmental reporting or to enforce any rights 1St Preference Mortgage may have against you as necessary. Information about you that is available to you via the Site or the Services, including any of your financial information, can become subject to the legal systems and laws in force in each state or country (a) where it is held, received or stored by you or us, (b) from where it is accessed by you or us, or (c) through which it passes. In addition, because your account(s) may include information about more than one individual and about your business relations with 1St Preference Mortgage and its affiliates, statements released to comply with legal process may contain information regarding your relationship with these individuals and with us and our affiliates.
- 1St Preference Mortgage may disclose your Personal Information (i) at the request of a bank or other regulatory agency or in connection with an examination of us by bank or other examiners; (ii) to our internal or external auditors or attorneys; (iii) when 1St Preference Mortgage believes disclosure is necessary or appropriate to prevent physical harm or financial loss in connection with an investigation of suspected or actual illegal activity, (iv) to an internet service provider or any other third party agent or service provider for any purpose related to offering, providing, administering or maintaining the Services and/or (v) if disclosure is necessary to protect the vital interests of a person.

- 1St Preference Mortgage **does not** sell or rent Personal Information. 1St Preference Mortgage may disclose or share Personal Information about its clients to nonaffiliated third parties with whom it has contracted to perform services on its behalf. 1St Preference Mortgage requires its third-party servicers to agree to comply with appropriate privacy and security standards or to undertake to provide similar and appropriate levels of protection as 1St Preference Mortgage when processing Personal Information. In addition, 1St Preference Mortgage may share Personal Information and other data collected through the Site and the Services with a successor entity in the event of a merger, acquisition or similar transaction.
- 1St Preference Mortgage does not disclose nonpublic personal information about former clients, except as permitted or required by law.

## **HOW WE TRANSFER AND STORE PERSONAL INFORMATION**

1St Preference Mortgage will transfer Personal Information to the United States and may transfer Personal Information to other countries where 1St Preference Mortgage does business, which may not have the same data protection laws as the country in which you reside. The transfer of Personal Information to other countries is based on a business need or to comply with applicable laws. Personal information stored or processed in a foreign jurisdiction may be accessed under a lawful order made in that jurisdiction. By providing your information to 1St Preference Mortgage in the course of your access and use of the Site or the Services, you explicitly consent and opt in to your Personal Information being transferred to and stored in other countries, including the United States, for the purposes explained in this Privacy Statement.

## **HOW WE PROTECT PERSONAL INFORMATION**

Our practices are designed to ensure that Personal Information is:

- Relevant to and not excessive for the purposes for which it is collected;
- Kept up-to-date, with necessary steps taken to correct or delete information that is inaccurate or incomplete if 1St Preference Mortgage becomes aware of such occurrences;
- Kept only as long as is reasonably necessary for the purposes for which it was collected and processed or, as otherwise required to comply with applicable laws; and
- Subject to appropriate technical and organizational measures to prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage
- We use encryption technology and other layered security to protect the transmission of personally identifiable data to or from you using 128-bit encryption and Secure Sockets Layer. Nevertheless, because information about you and your relationship with us can be accessed through a public network, the Internet, there can be no assurance that your information will remain secure and you accept the risk that unauthorized persons may view such information. If you believe that an unauthorized person has accessed your information, please contact your Client Services Officer immediately.
- To safeguard against unauthorized access to Personal Information by third parties outside 1St Preference Mortgage, all electronic Personal Information held by 1St Preference Mortgage is

maintained on systems protected by secure network architectures that contain firewalls and intrusion detection devices. The servers holding Personal Information are “backed up” (i.e., recorded on separate media) on a regular basis in an effort to avoid any inadvertent erasure or destruction of such Personal Information. The servers are stored in facilities with appropriate security and fire detection and response system.

- 1St Preference Mortgage limits access to its internal systems that hold Personal Information to authorized users, each of whom are given access through the use of a unique identifier and password, for the sole purpose of supporting the Site and the Services. 1St Preference Mortgage trains and educates its employees in the handling and safeguarding of Personal Information in accordance with applicable laws, rules, and regulations.

## **TYPES OF DIRECT MARKETING COMMUNICATIONS THAT 1ST PREFERENCE MORTGAGE ENGAGES IN THAT MAY UTILIZE YOUR PERSONAL OR ANONYMOUS INFORMATION**

1St Preference Mortgage may utilize a targeted market insight e-mail communication program to current clients and prospects. Some of these communications (i.e., to subscribe to 1St Preference Mortgage newsletters or previous customers) may require you to provide Personal Information such as your name and e-mail address.

Direct marketing communications may include:

- Thought leadership - These may include papers from our Vision series, whitepapers, bylines, etc.
- Links to 1St Preference Mortgage-sponsored programs or services
- Product and service updates - We will occasionally send you information on products and services. Out of respect for your privacy, we present the option not to receive these types of communications. Please see “Choice and Opt-out” below.
- Surveys
- Newsletters - If you wish to subscribe to our electronic newsletter(s), we will use your name and email address to send the newsletter to you.

We may receive a confirmation when you open a marketing e-mail from 1St Preference Mortgage if your computer supports this type of program, in order to help us make e-mails more interesting and helpful, and guide the development of future marketing and thought leadership campaigns. You can opt out from our marketing emails by clicking on the opt-out links at the bottom of 1St Preference Mortgage marketing emails.

### **Choice/Opt-Out of Direct Marketing Communications**

We provide you the opportunity to ‘opt-out’ of having certain marketing communication types sent to you. For example, if you receive a newsletter from us, but do not wish to receive any additional marketing

materials, you can indicate your preference. If you no longer wish to receive our newsletter or promotional communications, you may opt-out of receiving them by following the instructions at the bottom of the e-mail communication.

### **Linking to Other Sites**

We may provide links to non-1St Preference Mortgage websites. If you follow links to websites not controlled by 1St Preference Mortgage, you should review their privacy policies and other terms, as they may be different from those of our Sites. 1St Preference Mortgage does not guarantee and is not responsible for the privacy or security of these websites, including the accuracy, completeness, reliability or suitability of their information.

### **Social Media Sites**

1St Preference Mortgage also provides experiences on social media platforms such as Facebook®, Twitter® and LinkedIn® that enable online sharing and collaboration among users who have registered to use them. *Any content you post to a 1St Preference Mortgage Facebook, Twitter or LinkedIn page, such as pictures, information, opinions, or any Personal Information that you make available to other participants on these social platforms, is subject to the Terms of Use and Privacy Policies of those platforms.* Please refer to them to better understand your rights and obligations with regard to such content. As with our e-mail marketing programs, if users of our social media pages post to them, web analytics and tracking may be used by 1St Preference Mortgage Sales and Marketing teams to better understand the interests of the social media community for the purpose of designing a successful content marketing program.

### **Employment**

If you provide personal information via email to apply for employment with 1St Preference Mortgage, you consent to the collection, use and retention for a reasonable period of time of your personal information for the purposes of considering you for the possibility of present or future employment at 1St Preference Mortgage. We will not sell, rent, give or otherwise disclose your personal information to anyone outside of 1St Preference Mortgage or its affiliated companies within the 1St Preference Mortgage group of companies, without your consent, unless required to do so in accordance with law, regulation or legal process.

### **Protecting Information**

We strive to protect all personal information we receive online with appropriate safeguards and security measures. However, the Internet is not a secure medium, and neither the privacy of your communications

nor visits to this Website can be ensured. Accordingly, by visiting this Website, you acknowledge and agree that 1St Preference Mortgage does not guarantee the security of any information you transmit to us, and that you do so at your own risk.

## **HOW YOU CAN PROTECT YOUR ONLINE INFORMATION**

Along with the security measures used by 1St Preference Mortgage, there are measures you can take to ensure the security of your electronic Personal Information:

- Log off the Site when you are done viewing your information or whenever you leave your Device.
- Always be careful not to use your Device in a way that permits others to view your personal or other information on your screen.
- Do not store any information that you access via the Site.
- Should you lose your Device, or reasonably conclude that another person may access or have accessed your password on your Device, you should take immediate actions such as changing your Information to limit the potential damage.
- Use all security features of your Device, including the "Passcode Lock" function, as one step to protect your Device and the confidentiality of your information and any other information contained therein.
- Notify 1St Preference Mortgage immediately if you become aware of any disclosure, loss, theft, or unauthorized use of your information or other security tools or any loss, theft or unauthorized use of your Device.
- Keep your Device updated with the latest security updates and patches.
- Review your Device security settings
- Be wary of e-mails from addresses or people you do not know.
- Avoid using "public" computers or network connections, especially when reviewing financial or Personal Information.
- Keep your password confidential and avoid using the same password for different Web sites.

## **WHAT IS THE PROCESS FOR REPORTING AND HANDLING SUSPECTED SECURITY INCIDENTS?**

1St Preference Mortgage is committed to offering our clients the highest level of support possible. If you suspect that there has been any unauthorized breach of your information online, you should notify 1St Preference Mortgage immediately.

If the circumstances require, security incidents will be escalated to our technical support staff for evaluation. If any breach of security appears to have occurred, 1St Preference Mortgage will investigate it further. If necessary, 1St Preference Mortgage will provide you an interim update of our investigations and the status of your case. Final resolution of any such incident, though, will depend on the nature and complexity of the incident, as well as the details surrounding the case.



## **YOUR RIGHTS**

As a person who provides 1St Preference Mortgage with Personal Information, you may inquire as to the nature of the Personal Information stored at and/or processed by 1St Preference Mortgage. You will be provided reasonable access to your Personal Information held by 1St Preference Mortgage and, where appropriate, with the ability to review and correct inaccuracies. 1St Preference Mortgage will reasonably cooperate in providing such access.

To help protect your privacy and provide security, 1St Preference Mortgage takes reasonable steps to verify your identity before granting access to information. 1St Preference Mortgage shall respond to such reasonable request made by you within such time period as required under applicable law after your identity has been confirmed and you have clarified the specific Personal Information that you require. If you demonstrate that the purpose for which the Personal Information is being processed is no longer legal or appropriate, the Personal Information will be deleted, unless the law or applicable data retention requirements require otherwise.

Updated: April 10, 2014

### Privacy Policy

*At 1St Preference Mortgage Corporation, we are dedicated to conducting business with the utmost commitment to protecting your private information. We respect the privacy of our customers and understand the importance of having security measures in place to protect valuable personal information.*

### Personal Information

All personal information collected by 1St Preference Mortgage Corporation is used solely for the purposes of providing rate quotes and/or processing mortgage loans. We will never sell any personal information to third parties. Disclosure of personal information will only be made where required such as to process your credit reports, appraisal, title, etc.

Additionally, anonymous information about website visit statistics may be disseminated to third party service providers that we may partner with for hosting ads on our company's behalf across the internet. These third parties will never be provided with any personal or financial information.

### **Security**

1St Preference Mortgage Corporation takes important steps to guard our website users' personal and financial information. All information entered on our website is protected on-line as well as off-line.

## How Do We Protect Your Account?

1. 128-bit High Encryption Browsers. We require you to use a secure browser to access account information and perform transactions. This helps to ensure that the information you access is secure and confidential.
2. Encrypted Data. After you have entered your information, the encrypted data is transported between our systems and our alliance systems. Ensuring the security of your financial transactions is never a finite process for us. We use professional security experts to manage and monitor 24-hours a day, 7-days a week to help ensure that your information is secure.

## Contact

When you enter your contact information on our website, we will contact you to explore your interest in our services by phone and/or e-mail. We may contact you if we receive your contact information through any third-party mortgage brokers. When working with you, 1St Preference Mortgage Corporation will contact you through phone and/or e-mail throughout the loan process as needed in order to ensure smooth and timely completion of the loan process. We may also contact you in the future to notify you of any offers and programs that we feel you may be interested in. You will, however, have the option of opting out of receiving any correspondence from us that is not related to your transaction with us by contacting us at any time. Contact us [here](#).

## What is SSL and How Does it Protect Me?

SSL protocol provides secure communications on the Internet. Essentially, SSL does three things:

### 1.

SSL creates a secure communication channel by encrypting communication between the user and the server.

### 2.

SSL authenticates that the server to which you are connected is indeed correct. You can be assured that you are actually communicating with us, and not a third party trying to intercept the transaction.

3.

SSL conducts a cryptographic word count to ensure data integrity between the server and the user. With SSL, even this check sum is encrypted so it cannot be modified