


SecuriTitle 

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Our Best Practices are in Place!

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Here at SecuriTitle, LLC we realize that privacy and security are the most critical concerns of our clients, customers and consumers. We adhere to these “Best Practices” to ensure that there is no breach in privacy and/or security:

- 1. LICENSING:** SecuriTitle, LLC carries the necessary licensing in the State of New Hampshire and Florida to operate as a title agency.

In Massachusetts, pursuant to REBA v. NREIS, Laws of the Commonwealth of Massachusetts and customs and practices, Attorney Rebecca A. Lewis is the supervising Attorney in charge of all Financed transactions closed by SecuriTitle, LLC.

- 2. Escrow Account Control:** SecuriTitle, LLC has adopted appropriate and effective written procedures and controls for the safeguarding of client and consumer funds. These procedures help ensure accuracy and minimize the exposure to loss of client and/or consumer funds. Escrow and operating bank accounts are separately maintained, and each account is clearly labeled as either a separate escrow account or a Company operating account. All documentation pertaining to each account, including but not limited to, bank statements, disbursement checks and deposit tickets, are clearly labelled and secured in a locked cabinet. Only authorized personnel have access to the accounts and the documentation pertaining to each account. No client,

customer or consumer funds are ever commingled with Company operating funds. The receipts and disbursements of escrow accounts are performed daily, and three-way reconciliation of each account is performed on a monthly basis by a third-party vendor that specializes in three-way reconciliation in order to ensure any discrepancy is immediately detected and addressed.

3. Information and Data Privacy: SecuriTitle, LLC has adopted an effective written privacy and information security program (“WISP”) to protect non-public personal information as required by local, state, and federal law. Each team member is trained and advised of the procedures and receives a copy of the WISP. We take the utmost care in protecting non-public personal information and adhere to a “clean desk” policy to establish a culture of security and trust within the Company. When files are not in use during normal business hours, they are stored in locked cabinets and then shredded upon completion. The general public has no access to any area within the Company where there is non-public personal information. All computers in the Company are protected by security controls such as firewall and intrusion protection services with malware and virus protection software, as well as dual factor authentication upon logging on to the computer. Electronic access to files is limited only to authorized team members of SecuriTitle, LLC with appropriate password controls. Any electronic communication, such as email correspondence, is encrypted to protect non-public personal information.

4. SETTLEMENT POLICIES AND PROCEDURES: SecuriTitle, LLC has adopted standard real estate settlement procedures and policies that help ensure compliance with federal and state consumer financial laws applicable to the settlement process. Settlement Transactions (closings) in Massachusetts are conducted by a Licensed Real Estate Attorney. Settlement Transactions in New Hampshire and Florida are conducted by Notaries, Signing Agents or Attorneys.

5. TITLE PRODUCTION: SecuriTitle, LLC has adopted and maintains effective written procedures related to title policy production, delivery, reporting and premium remittance. Title Orders are processed either the same day or next business day after receipt. All terms and conditions are satisfied at settlement and all policies are prepared, delivered, reported and premiums remitted within thirty (30) days of settlement. Policies and premiums are remitted to the underwriter within thirty (30) days of settlement.

6. ERRORS & OMISSIONS: SecuriTitle, LLC maintains a policy of professional liability insurance and fidelity coverage. The coverage maintained has the financial capacity to stand behind all professional services conducted by SecuriTitle, LLC.

7. CONSUMER COMPLAINTS: SecuriTitle, LLC maintains written procedures for resolving consumer complaints. Any complaint received is handled promptly by the Operations Manager and is immediately resolved to the satisfaction of the client, customer and/or consumer.