

# Vertifi Software, LLC

## Privacy Notice

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Vertifi Software, LLC (“Vertifi”) recognizes the importance of protecting the security and confidentiality of customer information, including personal and privileged information of our customers’ customers. Vertifi collects nonpublic personal information about its customers and their customers (collectively “customer personal information”) from information received on applications and other forms, as well as transactions with us and our affiliates.

16 CFR Part 313 (Privacy of Consumer Financial Information) of the Federal Trade Commission’s Regulations deems Vertifi a “service provider” for the purposes of this Privacy Notice. In order to implement the provisions of this and other applicable federal and state laws and regulations, Vertifi agrees to not sell, transfer, or disclose personal information provided by individuals to third parties other than our affiliates and our service providers who are under an obligation to maintain the confidentiality of such information. Vertifi will not use such information for any purpose other than that for which it was provided, but it may use such information to provide products and services to customers in order to alert them to new, enhanced, or improved products or services, which we or our affiliates provide. To the extent that the European Union’s General Data Protection Regulation (“GDPR”) applies to any customer personal information provided to Vertifi by its customers (as a processor of Customer Personal Data under the GDPR), Vertifi will comply with the obligations applicable to it under the GDPR with respect to the processing of customer personal information.

Section 501(b) of the Financial Service Modernization Act, also known as the Gramm-Leach-Bliley Act (“GLBA”) and certain state laws and regulations require every financial institution to develop an information security program that is designed to:

1. Ensure the security and confidentiality of customer personal information;
2. Protect against any anticipated threats or hazards to the security or integrity of such information; and
3. Protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer.

Vertifi maintains appropriate security standards that include administrative, technical, and physical safeguards that comply with applicable federal and state requirements to protect the security and confidentiality of customer personal information.

Vertifi requires all third party vendors and service providers, who handle customer personal information on our behalf, to agree by written contract to follow reasonable and appropriate guidelines for security and confidentiality and to comply with applicable law. Vertifi also performs due diligence on such third party vendors and service providers for the adequacy of safeguards that protect customer personal information.

Vertifi has an Incident Response Program in place that provides guidance for our response if a security incident occurs. If an incident occurs that involves unauthorized access to customer personal information, Vertifi will take actions that it deems to be appropriate, including timely notification of security incidents as required by applicable law.

The retention and destruction of customer personal information is subject to applicable federal and state laws and regulations. Vertifi will continue to maintain the appropriate security standards designed to protect the information it holds against unauthorized access and against unauthorized use until the date when deletion or disposal of the information occurs.

### **Contact Information**

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