

# **PRIVACY POLICY**

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## **1.0 PURPOSE AND SCOPE**

It is the Policy of Academy Mortgage Corporation (“Academy”) to protect and safeguard customer information and only share that information when legal and appropriate. The purpose of this Privacy Policy is to clearly identify Academy's commitment to customer privacy. This Policy discusses why, when and how Academy gathers and shares customer information, and how Academy protects and safeguards customer information. Academy does not provide customers the opportunity to opt-out of sharing non-public personal information subject to the limitations of our sharing practices.

## **2.0 APPLICABLE REGULATIONS AND GUIDANCE**

The Financial Services Modernization Act (Gramm-Leach-Bliley -- GLB) of 1999, Title V – Privacy:

- Requires clear disclosure by all financial institutions of their privacy policy regarding the collecting of customers’ non-public personal information and the sharing of that information with both affiliates and third parties;
- Requires a notice to consumers and an opportunity to opt-out of sharing of non-public personal information with nonaffiliated third parties subject to certain limited exceptions;
- Clarifies that the disclosure of a financial institution's privacy policy is required to take place at the time of establishing a customer relationship with a consumer and not less than annually during the continuation of such relationship; and
- Clarifies that nothing in this title is intended to modify, limit, or supersede the operation of the Fair Credit Reporting Act.

The Fair Credit Reporting Act (FCRA) of 1970, as amended by the Fair and Accurate Credit Transactions Act (FACT Act) of 2003, Section 214.

- Requires an opt-out of sharing a customer’s credit report or eligibility information with affiliates for the purpose of marketing to them.

### **3.0 POLICY AND GUIDELINES**

It is the Policy of Academy to protect and safeguard customer information and only share that information when legal and appropriate to do so. Academy recognizes the importance of protecting customer information and maintaining its privacy. Academy provides customers with residential mortgage loans and other quality services, obtains and uses private customer information to do so. Academy values its customer relationships and will explain to customers how it collects, uses and protects their information.

#### **3.1 WHY ACADEMY COLLECTS CUSTOMER INFORMATION**

Academy collects information to identify customers, confirm facts about them, help assess requests for financial products and services, and deliver financial products and services to them.

#### **3.2 CUSTOMER INFORMATION COLLECTED BY ACADEMY**

Academy gathers customer information from a variety of sources, such as:

- Information customers, or others on their behalf, provide on applications and other forms, including identifying information such as name, address, telephone number, e-mail address and social security number and credit-related information such as assets, income, and liabilities;
- Information from consumer reporting agencies such as credit history and capacity; and
- Information from outside sources like, employers, landlords, banking institutions and others sources, such as employment status and rental history or deposit amounts.

#### **3.3 PROTECTING CUSTOMER INFORMATION**

Safeguarding customer information is important to Academy. Academy will implement systems, policies and procedures to maintain the accuracy of customer information and to protect it from loss, misuse, or alteration. Customer information is accessible by appropriate personnel who have a business need for the information. Academy will provide training and communication programs to educate its personnel about the meaning, importance, and requirements of this Privacy Policy.

#### **3.4 HOW ACADEMY USES CUSTOMER INFORMATION**

Academy will use customer information to respond to customer requests for financial products and services, administer accounts, develop new financial products and services and comply with legal and regulatory requirements. Academy may also use customer information to determine which products or services might be of interest to its customers.

In striving to serve customers, Academy may share customer information with others so they may provide services to Academy or on Academy's behalf or jointly with Academy to meet customer needs. Academy will not sell personal information about customers to non-affiliated companies for their independent use. However, Academy may share information as permitted by law.

### 3.5 SHARING INFORMATION WITH OUR AFFILIATES

Academy may share the information it collects about former, current, and prospective customers with its affiliates. This information is shared in the normal course of conducting business and offering products and services to these customers. Sharing of information is limited. Shared information includes information Academy gathers during its dealings with customers. Academy does not share customer credit information collected from outside sources, such as credit reports, with affiliated companies.

### 3.6 SHARING INFORMATION WITH NON-AFFILIATED COMPANIES

In order to provide customers with the services they request and with other valuable financial products and services, Academy may share customer information with non-affiliated companies when this sharing enables Academy to service accounts, provide products or services requested, report Academy's experience with the customer, protect Academy against fraud and other unauthorized transactions, and/or respond to governmental requests and regulatory requirements. Academy may share information to offer financial products and services jointly with other financial service providers.

Academy may share customer information about present and former customers with the following types of companies:

- Financial service providers and non-financial companies which provide services on behalf of Academy, such as companies that prepare account invoices or statements, service accounts, promote and market Academy's products, provide computer and systems support, or other similar services; and
- Others, such as independent contractors or suppliers.

Non-affiliated companies receiving customer information from Academy are required to enter into agreements with Academy to protect the information they receive before that information is provided. These agreements must limit the use of the information to providing the services requested by Academy. Academy may not share customer information with other companies unless an agreement to protect that customer information is in place, except as otherwise permitted by law.

3.7    **MARKETING CAMPAIGNS**

In states where Academy is legally required; customers who receive e-mail marketing messages from Academy will be offered a choice to "unsubscribe" or "opt-out" of future email marketing messages. Academy will track and respect all opt-out elections made by its customers.

3.8    **ADDITIONAL CUSTOMER RIGHTS**

Academy discloses its Privacy Policy at the time of establishing a customer relationship with a consumer and not less than annually during the continuation of such relationship.

Some states may provide additional privacy protections under existing or future state laws. Academy will comply with applicable state law when sharing customer information.

#### **4.0 RESPONSIBILITIES**

The ultimate authority and responsibility for this Policy lies with the Senior Management of Academy. The Senior Management delegates the responsibility for implementing, monitoring and maintaining this Policy and the guidelines set forth herein to the Compliance Committee.

Under the direction of Academy's President, it is the responsibility of the Compliance Officer to ensure that all managers provide appropriate training and make their employees aware of the objective of this Policy and the guidelines set forth herein.

The Compliance Officer will work with Academy management to develop and maintain procedures to ensure that customer information is safeguarded both in the hands of the Service Providers and when accessed by Academy personnel.

#### **5.0 MONITORING AND RECORDKEEPING**

The Compliance Officer will periodically conduct such tests and maintain such reports as necessary to document that the requirements outlined in this Policy are maintained and followed. The Compliance Officer will report on the compliance with this Policy to Academy's President and the Compliance Committee at least annually.

#### **6.0 EXCEPTIONS**

Any exceptions to this Policy must be approved by the Compliance Committee in advance.

#### **7.0 ANNUAL REVIEW**

This Policy shall be reviewed and approved by the Board of Directors no less than annually.