

CATIC FINANCIAL PRIVACY POLICY

I. PURPOSE OF THIS NOTICE

Title V of the Gramm-Leach-Bliley Act (GLBA) and many state laws generally prohibit any financial institution, directly or through its affiliates, from sharing nonpublic personal information about you with a nonaffiliated third party unless the institution provides you with a notice of its privacy policies and practices, such as the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, and many state laws, we are providing you with this document, which notifies you of the privacy policies and practices of CATIC Financial and its affiliates. We will not use this information for other purposes than the stated purposes.

II. NOTICE

The CATIC Financial Privacy Policy is given to all customers. The CATIC Financial Privacy Policy or other specific instructions or requirements for handling personal information are communicated to third parties to whom personal information is disclosed. We also make our Privacy Policy available on our website.

III. CHOICE AND CONSENT

You consent to our use of this information so that we can provide financial services to you.

IV. COLLECTION

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you such as on applications or other forms.
- Information about your transactions we secure from our files, or from our affiliates or others.
- Information we receive from a consumer reporting agency.
- Information that we receive from others involved in your transaction, such as the real estate agent or lender.

Nonpublic information is collected only for the purposes identified in this notice. Unless it is specifically stated otherwise in an amended Privacy Policy Notice, no additional nonpublic personal information will be collected about you but if we do we will inform you.

V. USE, RETENTION, AND DISPOSAL

We use the nonpublic information about you to help us provide financial services to you. We retain the nonpublic information about you pursuant to our CATIC Financial Comprehensive Written Security Plan which also dictates how such nonpublic information is disposed. We retain your personal information for as long as is needed to fulfill its stated purpose.

VI. ACCESS

We make reasonable efforts to restrict access to nonpublic information about you to those employees who need to know that information in order to provide products or services to you. If you wish to access your nonpublic personal information contact CATIC. We will provide you with the nonpublic personal information after we authenticate that you are entitled to the information. If we determine that you are not entitled to such nonpublic information we will inform you in writing of that fact and the reason for such denial. Personal information is provided to the individual in an understandable form, in a reasonable timeframe, and at a reasonable cost, if any. If the request is denied you will be informed of the reason in writing.

VII. DISCLOSURE TO THIRD PARTIES

We may disclose any of the above information that we collect about our customers or former customers to our affiliates as permitted by law. Nonpublic personal information is only disclosed to third parties to facilitate their transaction and who agree to protect this information in a manner consistent with the relevant aspects of this privacy policy or other specific instructions or requirements. We have procedures in place to evaluate that the third parties have effective controls to meet the terms of the agreement, instructions, or requirements. Personal information disclosed to third parties for new purposes or uses will require explicit consent of the individual.

VIII. SECURITY

We maintain physical, electronic and procedural safeguards that comply with federal and state law to guard your nonpublic information. Ongoing procedures are performed for monitoring the effectiveness of controls over personal information, based on a risk assessment, and for taking timely corrective actions where necessary.

IX. QUALITY

We maintain safeguards to ensure the quality of the nonpublic information that we collect.

X. MONITORING AND ENFORCEMENT

The effect on privacy requirements from changes in the following factors is identified and addressed:

- Legal and regulatory
- Contracts, including service-level agreements
- Industry requirements
- Business operations and processes
- People, roles, and responsibilities
- Technology

Privacy policies and procedures are updated to reflect changes in requirements.

We take remedial action in response to misuse of personal information by employees or third parties to whom the information has been transferred. Instances of noncompliance with privacy policies and procedures are documented and reported and, if needed, corrective and disciplinary measures are taken on a timely basis.

Effective November 19, 2013
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