

At Northway Title Agency, Inc., we understand that the privacy of your personal information is a vital part of the foundation for a client relationship. We have always protected the confidentiality of information associated with our clients and are bound by our professional standards to continue that protection. We are providing you with the following information so that you may understand how we protect your nonpublic information.

I. How Northway Title Agency, Inc. Collects Nonpublic Client Information

Northway Title Agency, Inc. collects nonpublic personal information about our clients from the following sources:

Information You Provide: The work or services we perform for you routinely require us to obtain private information directly from you, or from an authorized representative, so that we can perform the tasks required to fulfill your request.

Other Sources: Depending upon the particular service being performed on your behalf, we may request nonpublic information concerning you. This information may be provided through credit reports, bank records, or other nonpublic records obtained with your specific authorization.

II. Disclosure of Nonpublic Information

At Northway Title Agency, Inc. our privacy policy is to never disclose nonpublic information about you, our client. Nonpublic personal information is defined in the federal regulations as:

- Nonpublic personally identifiable financial information provided to us by you during the course of our services.
- Any publicly available information that we acquire by using information you have provided us in connection with any services we perform for you. An example would be a bank account number that is used to acquire information regarding a court trial or other public record that would not have been found by us without using the bank account number acquired from you.
- Any nonpublic information we acquire by using nonpublic personal information provided to us by you during the course of our services.

For purposes of our business relationships with you, all information acquired is disclosed only under the following conditions:

Employees of the firm: Employees who need such information to complete a transaction for which you have engaged our firm.

Affiliated Businesses: Northway Title Agency, Inc. is affiliated with two related businesses for the purpose of facilitating the purchase, financing or refinancing or the sale or transfer of real estate. These entities, Ianniello Anderson, PC and Synergy Real Estate Solutions, LLC (dba Synergy Real Property Solutions NY LLC) may be provided with nonpublic personal information to facilitate the completion of certain activities related to work being performed for you. Examples of these activities would be the research or recording of deeds and loans, or obtaining a title insurance policy in conjunction with a real estate transaction.

Service Providers: As with any business, we too have our own referral network, accounting, insurance and other service firms that may need access to your nonpublic personal information. An example might be sharing your personal information to obtain a title insurance policy or in conjunction with recording deeds or legal instruments. If you were

referred by a mortgage broker, we may need to provide them with information to complete your real estate transaction. Another example would be computer consultants who must maintain or change our computer processing systems. Our service providers understand the confidential nature of your nonpublic information and agree to protect information provided.

Others: Other than those providers or business partners stated above, we do not disclose nonpublic personal information, or any other information about you, to any outside party without your authorization. Your nonpublic personal information will not be shared with any other party for marketing or solicitation purposes. However, if compelled by law, such as a court order, subpoena or law enforcement request, we may be compelled to share your information with an appropriate party.

In addition to the privacy protection that FTC regulations provide you, the Internal Revenue Code prevents the disclosure of client information provided for tax planning or preparation services performed by Northway Title Agency, Inc. without your written permission.

III. Security Arrangements

We maintain physical, electronic and procedural safeguards that comply with regulations and guidelines designed to guard your nonpublic personal information and any other information we maintain on you. These procedures and safeguards are in keeping with our commitment to protect your nonpublic personal data that is in our possession.

IV. Opt Out Provision

The Federal Trade Commission regulations provide that this notice must include a provision for you to request that the firm not release your nonpublic personal information if we share your nonpublic information. Since we do not share your nonpublic personal information with any nonaffiliated third party, we are including this information for disclosure purposes only.

If you have any questions regarding this notice on your privacy rights, please contact Northway Title Agency, Inc. at 518-371-9005.

We appreciate the opportunity to work with you.

Anthony R. Ianniello
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