

# NRT INSURANCE AGENCY, INC. CONSUMER PRIVACY POLICY NOTICE



## Our Privacy Pledge

At NRT Insurance Agency, Inc. ("NRT Insurance"), protecting your privacy is very important to us. We value your trust, and we want you to know what Personal Information we collect from our customers and prospective customers, how we use this information and how we protect it. We have adopted this Privacy Policy to guide how we, our affiliates, and our third party business partners utilize information about our customers. We treat Personal Information in accordance with this Privacy Policy and with all applicable laws and regulations. Our employees and agents are trained to respect the importance of maintaining the confidentiality of customer Personal Information. "Personal Information" means unique information about an identifiable individual, including names, telephone numbers, addresses, e-mail addresses, social security numbers or other ID numbers, credit card numbers, and related credit and transactional information and certain other personal information that customers may provide to us by any means, including through our websites, by e-mail, telephone, fax or mail. Personal Information does not include the name, title or business address or office telephone number of an employee or an organization, or the name, address, telephone number, or similar information of a person that is publicly available (e.g., in a public telephone directory). This Privacy Policy will evolve and change as we continue to study privacy issues. We hope that this Privacy Policy will maintain your trust in us and demonstrate our long-standing commitment to protect your Personal Information.

## Our Information Practices

This Privacy Policy applies to customers and prospective customers of NRT Insurance Agency, Inc., and the policies and procedures described in this Privacy Policy are designed to protect the privacy of your Personal Information. Our purpose in establishing this Privacy Policy and our information practices is to balance our legitimate business interests in collecting and using information with our customers' reasonable expectation of privacy.

## Purpose and Categories of Information We May Collect

In the normal course of business, we collect information only in a manner deemed reasonably necessary to serve our legitimate business purposes and comply with our legal obligations. The primary purpose we collect information is to provide (or have our affiliates or business partners provide) requested insurance, underwriting and claim administration services. Other purposes may include offering to you quality products and services that we believe are relevant to your interests. We believe that our customers benefit from promotional activity based on customer Personal Information employed to market goods and services offered by or through our family of companies and business partners. In the normal course of providing products and services, we may obtain from you such Personal Information as your name, address, email address, telephone number and Social Security number. Depending upon the products and services you request, we may also require information on your driving record, credit worthiness, and/or credit history. We obtain this information from various sources such as your applications and supporting forms, your transactions with affiliated companies, non-affiliated third parties and from consumer reporting agencies. We will use, protect and safeguard this information in accordance with this Privacy Policy.

## How We Use Your Information

As a general rule, we will not disclose, use or share any Personal Information about you except when we have your permission or under special circumstances, such as when we believe in good faith that the law requires it, or under the circumstances described in this Privacy Policy. Generally, by providing us with your Personal Information, you are communicating your consent to our use, disclosure and sharing of such Personal Information as described in this Privacy Policy. We will not sell or rent your Personal Information, and we will not permit third parties with whom we legally share your personal information to sell, rent, market or resell your Personal Information, outside our family of companies and affiliates. The following describes some of the ways that your Personal Information may be shared or disclosed.

## Sharing within the NRT LLC Family of Companies and to Affiliates

We may share transaction information about you, including Personal Information, and other information provided by law, within the NRT LLC Family of Companies and the companies and affiliates of our owner, Realogy Corporation. The NRT LLC Family of Companies and affiliates include, but are not limited to Coldwell Banker Residential Brokerage and other Coldwell Banker real estate brokerage entities.

## Sharing Information with Business Partners and Service Providers Outside of the NRT LLC Family of Companies

We may share customer Personal Information with certain non-affiliated companies (including, but not limited to, financial service providers), all of which have agreements with us. All of these companies act on our behalf in order to perform the services that you have requested or that we have requested on your behalf (such as to service your account or provide your monthly statement). We may also share customer Personal Information with third party service providers that market our products or services. These companies are contractually obligated to keep your non-public Personal Information that we provide to them confidential and to use the Information only to provide the services that you have requested or that we have asked them to perform for you and us.

## Disclosing Information in Other Situations

We may also disclose information about you as we believe in good faith is permitted by law, such as to respond to a subpoena or court order, to prevent fraud or to comply with an inquiry by a government (i.e., law enforcement) agency. We may also disclose information voluntarily to cooperate with law enforcement agencies in matters of national security. We may also share or disclose your information when we have reason to believe that sharing or disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our terms of service or Privacy Policy, or may be causing injury to or interference (either intentionally or unintentionally) with any of our rights, property, other customers or anyone else. We may also share or disclose your information for administrative and other purposes that we deem necessary to maintain, service and improve our products and services.

## Security: Safeguarding your Information

To protect our customer's Personal Information, we use and maintain appropriate, industry-standard physical, electronic, logical and procedural security and safeguards. Although "guaranteed security" does not exist, we make commercially reasonable efforts to protect, safeguard and prevent unauthorized access to such Information consistent with all applicable laws and regulations. We periodically review our security standards, procedures and technology to protect against unauthorized access to your confidential information. Currently, we utilize a variety of different security measures designed to protect Personal Information from loss and unauthorized use or access by users both inside and outside of NRT Insurance Agency, Inc. We take commercially reasonable efforts to create and maintain appropriate safeguards and practices to ensure that the Information is used only as authorized by NRT Insurance Agency, Inc. and consistent with this Privacy Policy, and that the Information is not improperly altered or destroyed. Our privacy protection practices have been designed to, among other things; assist us in supporting and maintaining authenticity, integrity and confidentiality of Personal Information. You should be aware that, to the extent that the information we received about you was obtained from a non-affiliated third party with whom you transacted, these third parties may have separate privacy and data collection practices, policies and measures. We have no control over, and no responsibility of liability for, the practices, policies and security measures implemented by these third parties. We encourage you to contact these third parties to ask questions about their privacy practices, policies and security measures before disclosing Personal Information to them.

## Corrections

We make repeated efforts to verify the accuracy of information and to correct and update our database from information available to us. In the event a customer or prospective customer believes that such information held by us is inaccurate or outdated, we, upon notification and sufficient time for verification, will take all reasonable steps to correct any inaccuracy or update outdated information of which we are made aware. If you wish to access your Personal Information in our possession or make corrections to it, you may do so by writing us at NRT Insurance Agency, Inc. 1601 Trapelo Road, Massachusetts 02451. In some limited circumstances, we may not be able to grant you access to your Personal Information, for example if doing so would threaten the security of another individual.

## Keeping You Informed About Our Privacy Policy

We will inform you of our Privacy Policy at least once a year, as long as you remain a customer with NRT Insurance Agency, Inc. you may also request a copy of our Privacy Policy, or address questions or complaints about our Privacy Policy of privacy practices, by writing to: NRT Insurance Agency, Inc. 52 Second Avenue, 3<sup>rd</sup> Floor, Waltham, Massachusetts. 02451; attn: Legal Department.

## Policy Changes

We may change or terminate this Privacy Policy at any time without prior notice. We will notify you of these changes and of any new, unanticipated uses of Personal Information not previously disclosed in this Privacy Policy.