

# **PRIVACY POLICY**

#### **Purpose**

The executive team and team members of Lake Area Mortgage respect the privacy of clients' personal financial information. We commit to treating such information responsibly.

Lake Area Mortgage takes necessary steps to safeguard the information that has been entrusted to us by our clients. The following privacy policy and disclosure outline our practice regarding personally identifiable financial information.

## Types of Information Lake Area Mortgage Collects

Lake Area Mortgage collects nonpublic, personal information about consumers from many sources, including:

- Information such as name, address, social security number, and income from membership and loan applications and other forms.
- Information such as account balances, payment history, parties to transactions, and credit card usage from transactions with us and our affiliates.
- Information such as creditworthiness and credit history from consumer reporting agencies.
- Information from current or past employers, other financial institutions, and other sources listed from verifications of information provided on applications and other forms.

Information that is available from government records, widely distributed media, or government-mandated disclosures is considered public information and may be collected from those sources.

### Type of Information Lake Area Mortgage Discloses

Lake Area Mortgage discloses personal financial information to nonaffiliated or affiliated third parties as required by law. Lake Area Mortgage may disclose information with non-opt out rights for consumers with companies who perform transaction processing for Lake Area Mortgage in the following circumstances:

- If the transaction, service, or product is requested or authorized by the consumer.
- To maintain or service a consumer's account as part of a private label credit card or other loan extension program.
- In connection with a securitization, secondary market sale (including servicing rights), or similar transaction related to a consumer.
- To enforce Lake Area Mortgage's legal or contractual rights or the rights of another person who is engaged in the financial transaction.
- As required in the ordinary course of banking business, such as the settlement of claims or benefits, the confirmation of information to the consumer or the consumer's agent, and the billing, processing, or clearing of items in the normal course of business.
- To insurance rate advisory organizations, guaranty funds or agencies, agencies that are rating Lake Area Mortgage, persons who are assessing Lake Area Mortgage's compliance with industry standards, and Lake Area Mortgage's attorneys, accountants, and auditors.
- As permissible under the Right to Financial Privacy Act.
- To a consumer reporting agency under the Fair Credit Reporting Act.
- To comply with federal, state, or local laws, rules, and other applicable legal requirements.

#### SAFEGUARDING CLIENT INFORMATION

Lake Area Mortgage protects consumer privacy by ensuring that only team members who have a business reason for knowing information have access to that information. Physical, electronic, or procedural safeguards are in place to protect nonpublic personal information.

All team members are trained annually regarding the importance of safeguarding Client information. Appropriate disciplinary action will be determined for team members who violate Lake Area Mortgage's privacy policy and procedures.

When changes are made to Lake Area Mortgage's policy or practice of sharing information, existing Members will be provided adequate time to opt out of the disclosure.