



At All Square Mortgage, Inc. (“All Square”), we respect the privacy of our clients and we are committed to keeping your personal information accurate, confidential, secure and private. We have adopted the following Privacy Policy to ensure that we continue to meet our commitment to your privacy.

Privacy Policy and Safeguard Procedures

All Square Mortgage provides a variety of products and services to the public, including but not limited to mortgage brokerage services. In the course of providing these products and services, we may collect certain personal information about our clients with their consent.

“Personal Information” means information about an identifiable individual. This may include, without limitation, the individual’s name, home address, age, income, credit history or other financial information, credit card information, personal preferences and other information about his or her family. Personal Information does not include the name, title, business address or telephone number of an employee of an organization. All Square may share this information with others, such as credit reporting agencies, financial institutions and title companies.

This Privacy Policy describes principles that All Square follows to ensure that we protect your Personal Information. All of our employees who have access to Personal Information must adhere to our Privacy Policy and related procedures.

Accountability

All Square is accountable for all Personal Information in our possession or custody, including Personal Information disclosed to third parties for purposes of providing services requested by you.

Identifying Purposes

All Square will inform you of the purposes for which we are collecting any Personal Information before, or at the time, the information is collected. Often the purposes are outlined within the body of any mortgage application.

Consent

All Square will obtain your consent before or when we collect, use or disclose your Personal Information.

Consent can be express, implied or given through an authorized representative. You may withdraw your consent at any time (subject to any legal consequences of which you will be informed). However, All Square may collect, use or disclose Personal Information without your knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted or required by law.

Limiting Collection

The information collected by All Square will be limited to those details necessary for the purposes we have identified to you or to perform the services you have requested. Information will be collected by fair and lawful means.

Limiting Use, Disclosure and Retention

Personal Information will only be used or disclosed for the purposes for which it was collected unless you have otherwise consented. Personal Information may be retained for the amount of time needed to fulfill the purposes for which it was collected unless federal or state law permits otherwise.

Accuracy

All Square will keep Personal Information as accurate, complete and current as necessary to fulfill the identified purposes for which it was collected. You may have this information amended where it is found to be inaccurate or incomplete.

Safeguarding Personal Information

Personal Information is safeguarded using measures appropriate to the sensitivity of the information and in keeping with generally accepted industry standards.

Openness

All Square will make information available to our clients and employees about the policies and procedures we use to manage Personal Information.

Access

Upon written request, you will be informed of the existence, use and disclosure of your Personal Information and will be given access to it. We will respond to such requests as efficiently as possible. If we are prohibited from providing such access, we will explain the reasons for the lack of access, except where prohibited by law.

Addressing Complaints and Suggestions

If you have questions, concerns or complaints regarding this Privacy Policy or Safeguarding Plan regarding your personal information, you may contact the All Square corporate office.

[The Kind of Information We Collect](#)

All Square gathers and uses Personal Information in order to provide you with the products and services you have requested, namely: information that is required to effectively provide mortgage brokerage services and to ensure that you are satisfied with the products and services we have provided. We may also use your Personal Information to update you about our services and to offer you additional products or services that you may be interested in, so that we may continue to serve your needs. All information that you do provide us with is securely maintained and kept strictly confidential.

[How We Use Your Information](#)

We use Personal Information for three general purposes:

- To communicate with you in order to provide you with our products and services.
- For inclusion in documentation relating to your particular financial transaction.
- Transactional information to monitor our level of service and report back to you to ensure your satisfaction with the provision of such services.

When We Are Permitted To Disclose Your Information

All Square is obligated to keep your Personal Information confidential except under the following circumstances:

When Authorized by You

Many of the services offered by All Square require us to obtain Personal Information about you in order to perform the services you have engaged us to provide. We will always obtain consent from you first, and we will never use the information for purposes other than those which have been authorized by you.

You may withdraw your consent at any time, subject to any legal implications. In some cases, if you do not consent to our use or disclosure of certain Personal Information, we may be unable to continue to provide all or part of the services you have requested.

When Required by Law

The type of information we are legally required to disclose usually relates to government tax reporting requirements. However in some cases, such as under a court order, we may be required to disclose certain information to persons specified in the court order. We will only provide the specific information requested and only upon being satisfied that the authorities have legitimate grounds to request the information.

When Permitted by Law

The legislation has provided certain situations where we are legally permitted to disclose Personal Information without your consent. Examples include situations involving the collection of debts in arrears, medical emergencies, suspicion of illegal activities or as required by federal or state law.

With Whom We May Share Your Information

In the course of daily operations, All Square may share your information with other affiliates such as credit reporting agencies, financial institutions, and title companies in connection with the service being provided. All parties are required to follow all applicable laws and regulations, including this Privacy Policy. Unauthorized use or disclosure of confidential client information by any party is prohibited.

Opting Out

In order to provide you with our services and products, All Square, with your consent, may provide you with information on our products and services and may share your personal information with other affiliates. Should you not want to receive promotional materials from, or have your Personal Information shared with, an affiliate company, please contact our corporate office.

How We Safeguard Information

All Square has extensive controls in place to maintain the security of its information and information systems. Client and independent broker files are stored according to the sensitivity of the information contained therein. Appropriate controls (such as restricted access) are placed on our computer systems and data processing procedures. Physical access to areas where Personal Information is gathered, processed or stored is limited to authorized persons. Safeguards include, but are not limited to:

I. Office Locations

·Office locations or locations that contain or store client(s) personal information must have the ability to be locked and must be locked during non-business hours.

- A administrative staff member will be onsite during business hours, if for any reason a member is not onsite or is unavailable, all offices will remain locked and closed for business.
- Physical access to office workstations are restricted to authorized personnel only.
- Workstations will remain clean to reduce the threat of a security incident

II. File Cabinets

- File cabinets must have the ability to be locked.
- File cabinets will remain locked unless a particular file is being worked on.

III. Individual Files

- Files must be stored in a lockable cabinet when not in use.
- Files must never be stored in a vehicle.
- At no time will a file be left accessible to the general public when you are not present.

IV. Individual Documents

- Documents with Personal Information may not be left on a printer, fax machine, open shredding box or any place where the public may have access.

V. Passwords

- Each password must be unique and privately stored. Passwords must be at least 8 characters long and consist of letters, numbers and special characters.
- Each password must be changed on a quarterly basis.

VI. Email

- Emails that contain client Personal Information must be password protected.
- Never open an email attachment if you are unsure of the sender or suspicious of the email.

VII. Calyx Point

- All Square will utilize ABT, a secure server company appointed by Calyx Point.
- Each user will be assigned a user and password for access to the application software.
- Clients' personal documents will be uploaded to the document storage tab in the software.

VIII. Computers, Laptops and Mobile Devices

- Each computer, laptop, tablet, cell phone or any device where clients' Personal Information may be obtained must be password protected.
- The loss or theft of any device containing All Square Mortgage data must be reported immediately.

IX. Internet

- Wireless and LAN Connections must have a standard firewall and be password protected. WPA2 level encryption is required for wireless systems.

X. Patching and Updating

- Each computer systems are required to be updated or patched on a regular basis. General updates will be updated on a weekly basis to avoid software vulnerabilities.

XI. Service Providers

·All service providers must have safeguards in place prior to conducting business.

XII. Data Disposal

- If an organization has personal information in its control, it cannot simply throw it away in the trash. The organization must find a way to securely dispose of it. This includes electronic data stored on devices.
- Burn, pulverize, or shred papers containing customer information so that the information cannot be read or reconstructed.
- Destroy or erase data when disposing of computers, disks, CDs, magnetic tapes, hard drives, laptops, PDAs, cell phones, or any other electronic media or hardware containing customer information
- Electronic data will be expunged/cleared from each device. Each employee is held accountable to erase any data containing sensitive information.

XIII. Breach of Security

·Any suspicious activity or attempted breach of security must be report to the All Square corporate office immediately. All Square Mortgage will provide a Breach of Security policy and procedure.

FACTS**What Does All Square Mortgage, Inc. Do With Your Personal Information?**

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also required us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social Security Number and Income • credit history and account balances • retirement assets and employment information When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.	
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons All Square Mortgage, Inc. chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does All Square Mortgage, Inc. share?	Can you limit this sharing?
For our everyday business purposes -- such as to process your transactions, maintain your account(s), responds to court orders and legal investigations, or report to credit bureaus	Yes	Yes
For our marketing purposes -- to offer our products and services to you	No	We Don't Share
For joint marketing with other financial companies	No	We Don't Share
For our affiliates' everyday business purposes -- information about your transactions and experiences	No	We Don't Share
For our affiliates' everyday business purposes -- information about your creditworthiness	No	We Don't Share
For our affiliates to market to you	No	We Don't Share
For nonaffiliates to market to you	No	We Don't Share
Questions?	<ul style="list-style-type: none"> • Call 360-651-8448 or go to www.allsquaremortgage.com 	

Who we are	
Who is providing this notice?	All Square Mortgage, Inc.
What we do	
How does All Square Mortgage, Inc. protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does All Square Mortgage, Inc. collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> • apply for financing or give us your contact information • Open an account or provide employment information • provide account information
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes - information about your creditworthiness • affiliates from using your information to market to you • sharing for non-affiliates to market to you State Laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <i>All Square Mortgage, Inc. has no affiliates.</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • <i>All Square Mortgage, Inc. does not share with nonaffiliates so they can market to you.</i>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> • <i>All Square Mortgage, Inc. doesn't jointly market.</i>