

Penn Attorneys Title Insurance Co.
STANDARDS SAFEGUARDING CUSTOMER INFORMATION
Effective March 1, 2005

Purpose

Penn Attorneys Title Insurance Co. has developed and implemented the following administrative, technical and physical safeguards to protect the security, confidentiality and integrity of customer information, as required under sections 501, 505(b) and 507 of the Gramm-Leach-Bliley Act (15 U.S.C.A. § 6801, 6805(b) and 6807):

- To ensure the security and confidentiality of Consumer records and information,
- To protect against any reasonably anticipated threats or hazards to the security or integrity of the records.
- To protect against unauthorized access to or use of records or information that could result in substantial harm or inconvenience to a customer.
- To protect nonpublic personal information, including nonpublic personal financial information and nonpublic personal health information, as may apply.

Consumer/Customer Information

Penn Attorneys Title Insurance Co. gathers consumer information from transactions it insures that consists predominately of PUBLIC INFORMATION. On occasion, a consumer's file may include a title insurance policy provision which relates to nonpublic personal information. Additionally, a file may include an Affidavit or Statement of Information provided by the consumer or Approved Attorney that may contain nonpublic personal information.

Consumer/Customer Information Systems: Safeguarding Methods

To ensure security and confidentiality, the following methods have been instituted to safeguard sensitive information:

Computer Database

1. Computer database consumer/customer information is limited to general information gathered from public records.
2. Computer database access is password protected.
3. Access to records or passwords shall be restricted to authorized personnel or authorized service providers.
4. Staff members are trained to handle the privacy of all consumer database information.
5. We regularly monitor and maintain access to the Company's databases; including removal of access rights to computers by former employees.
6. Management regularly reviews security procedures with the office staff.
7. Penn Attorneys Title Insurance Co. is part of the First American Title Insurance Company computer network. Security Provisions to protect the network are maintained by highly skilled and trained personnel.

Physical Files

1. An original title insurance file, which may contain a LIMITED AMOUNT of nonpublic personal information, is maintained for every transaction for which a title application has been filed with the Company. The original file is retained for approximately 3 years, then microfilmed and destroyed (by shredding).
2. The files are segregated from public access.
3. Staff members are trained to handle inquiries for information. Such requests are few and limited. The release of information is relegated to information derived from the public domain.
4. We regularly monitor the physical title plant so unauthorized personnel do not access information.
5. Management regularly reviews these procedures with office staff.

Risk Assessment

The management of Penn Attorneys Title Insurance Co. has reviewed information maintained in the consumer information system (database and files) to minimize the inclusion of the consumer's nonpublic personal information, thereby minimizing the likelihood of potential misuse of sensitive consumer information. Nevertheless, whenever nonpublic personal information is included in physical files, controls must be in place and have been implemented to consider the sensitivity of consumer information. By minimizing the amount of nonpublic personal information, Penn Attorneys Title Insurance Co. believes the risk is significantly reduced.

Identifiable internal threats

- Unauthorized disclosure or misuse of consumer nonpublic personal information by employees

Identifiable external threats

- Unauthorized access by a third party to consumer information systems

Controlling Risk

Management emphasizes a strict control of computer access and office files. The identifiable risks are controlled as follows:

Unauthorized disclosure or misuse by employees

1. Employees are instructed not to discuss or release nonpublic personal information.
2. Privacy issues and safeguarding procedures are regularly discussed and reviewed.
3. Employees are instructed to maintain secrecy of computer passwords.
4. Office systems are not accessible from remote locations by employees.
(Note: Authorized technical employees of the Parent Company may have access to the computer system.)
5. The Company prominently displays its Privacy Policy and Standards for Safeguarding Consumer Information in its office environs.
6. The intentional disregard and violation of these procedures by an employee will be considered employee misconduct and subject to the Company's Personnel Policy provisions.

Unauthorized access by a third party to consumer information systems

1. Management trains employees to be on guard as to the physical location of all visitors (limited number).
2. Only authorized personnel and authorized service providers are given access to the Company's files, computers and databases.
3. Our Parent Company, First American Title Insurance Company, maintains high security in the computer network.

Overseeing Service Providers

Whenever necessary, Penn Attorneys Title Insurance Co. may have to provide access to the information we collect to companies who provide services on our behalf. In overseeing these service providers:

- Penn Attorneys Title Insurance Co. exercises due diligence in selecting service providers, including:
 - software vendors and technicians
 - records management providers of microfilm and materials destruction
 - independent computer consultants
 - certified public accountants, auditors and examiners
- Penn Attorneys Title Insurance Co. works closely with and limits exposure of consumer information with all service providers.
- Penn Attorneys Title Insurance Co. requires assurances for safeguarding consumer information from all service providers that require access to the consumer information systems in the performance of their duties.
- Penn Attorneys Title Insurance Co., upon discovery and determination of a pattern of activity or a practice of a service provider that constitutes a violation of Title 31, Chapters 146a, 146b or 146c, will seek to terminate the contract or arrangement with the service provider or, if not feasible, report the violation or breach to the Pennsylvania Department of Insurance.

Periodic Review

Penn Attorneys Title Insurance Co. shall monitor, evaluate and adjust its procedures for securing consumer information and consumer information systems. Management and employees are encouraged to discuss potential internal and external threats that may arise based on changes and challenges in our day-to-day business.

Penn Attorneys Title Insurance Co. reserves the right to amend and alter the standards set forth herein as may be required by law and for the betterment of safeguarding sensitive consumer information.

For further information, contact:

Privacy Compliance Officer
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