



PARAMOUNT
— TITLE —

ALTA BEST
PRACTICES
MANUAL

JULY 1, 2020

TABLE OF CONTENTS

	<u>Page</u>
Purpose / Introduction	2
<u>Best Practice Number One</u> Licensing	3
<u>Best Practice Number Two</u> Escrow Accounts	7
<u>Best Practice Number Three</u> Privacy and Information Security	13
<u>Best Practice Number Four</u> Settlement Policies and Procedures	28
<u>Best Practice Number Five</u> Title Production	33
<u>Best Practice Number Six</u> Errors and Omissions, Fidelity, and Cyber Liability Coverage	36
<u>Best Practice Number Seven</u> Consumer Complaints	38
<u>Supporting Documents</u>	
Appendix A: Title Insurance Producer Licenses	41
Appendix B: Notary Commission Licenses	50
Appendix C: Certificates of Insurance	55
Appendix D: Disaster Recovery Plan	58
Appendix E: Complaint Policy	62
Appendix F: Privacy Policy	64
Appendix G: ALTA Membership Certificate	69
Appendix H: ALTA Self-Certification - Maturity Model	71

Paramount Title, LLC
2100 Calle de la Vuelta
Suite E104
Santa Fe, New Mexico 87505
505-772-0303

Purpose of this Manual

This Best Practices Manual has been developed by Paramount Title, LLC (“Company”) in accordance with guidelines set forth by the American Land Title Association and in compliance with both the Gramm-Leach Bliley Act and the Consumer Financial Protection Bureau established under the Dodd-Frank Act. The goal of this manual is to outline the policies and procedures established by Paramount Title, LLC in furtherance of our commitment to protect the security of consumers and to continue to provide professional high-quality services to our clients.

Introduction

Paramount Title, LLC’s Best Practices Manual follows the guidelines of the American Land Title Association which was developed in order to “to help members illustrate to consumers and clients the industry’s professionalism and best practices to ensure a positive and compliant real estate settlement experience.”

American Land Title Association (ALTA) has created “best practices” that are intended to define a set of strong procedures that the title insurance and settlement companies can follow to protect consumer information and provide higher levels of efficiency. The framework of ALTA’s “best practices” is designed with the expectation that a strong foundation will be established through adherence to the seven distinct pillars outlined in this manual.

The “best practices” of an industry are methods and techniques that are proven to produce superior results in achieving higher benchmarks. The purpose is to maintain consistent quality that serves as an enhancement to mandatory legislated standards and promote the industries adherence to compliance.

Paramount Title, LLC reserves the right to modify these Best Practice policies at any time. As of the date set forth below, this manual reflects the current Best Practice policies of Paramount Title, LLC.

ISSUED AND APPROVED on July 1, 2020 by:



Thomas W. Banner
General Counsel

BEST PRACTICE NUMBER ONE LICENSING

Definition: Establish and maintain current license(s) as required to conduct the business of title insurance and settlement services.

Purpose: Maintaining state mandated insurance licenses and corporate registrations (as applicable) helps ensure Company remains in good standing with state regulatory authorities.

Paramount Title, LLC Policy and Procedures: We maintain all local, state, and national required business and insurance licenses. Established in 2019, Paramount Title, LLC is active and in good standing in New Mexico. Copies of current insurance producer licensing documents, including Business Affiliation Form 202B and NAIC printouts for each licensed producer are available at Appendix A. Copies of current notary commissions for each notary employed at Paramount Title are available at Appendix B. A copy of Paramount Title's current ALTA Membership Certificate is available at Appendix G.

- Title insurance licenses are renewed in accord with New Mexico Office of Superintendent of Insurance ("OSI") regulations;
- Notary commissions are renewed in accord with New Mexico Secretary of State regulations;
- Annual Statistical Reports are completed and filed annually in compliance with OSI orders; and
- Where applicable, continuing education credits are completed for title insurance agent licensing.

I. TITLE INSURANCE LICENSE AND APPOINTMENT RENEWAL PROCEDURES

The New Mexico Office of Superintendent of Insurance (OSI) issued a Title Insurance Agency Producer License (License No. 3000749321) to Paramount Title, LLC on December 23, 2019; the license will expire on April 30, 2021. This license will be continually renewed in a timely manner.

The Company is currently appointed as agent for Fidelity National Title Insurance Company, Commonwealth Land Title Insurance Company and Stewart Title Guaranty Company.

A. ANNUAL PROCEDURES

The Company's General Counsel reviews and determines state licensing requirements annually. The Company General Counsel maintains a License Log and current copies of all state required licenses in a single location along with evidence that the Company and its employees are compliant with current licensing requirements.

1. The Company General Counsel determines the states in which the

company conducts the business of title insurance and settlement services. Presently, New Mexico is the only state where Paramount Title, LLC operates.

2. The Company General Counsel annually reviews the insurance licensing laws for state(s) where the Company operates and determines which licenses are required. A Title License Log is then created and maintained by the Company General Counsel for the next twelve months.

3. The Company General Counsel obtains copies of all business and individual licenses listed on the Title License Log and maintains them in a folder with the Title License Log. The details of each license are entered onto the Title License Log (including name, license #, expiration date and CE requirements).

4. The Company General Counsel confirms the current appointment of the Company and each individual on the licensing log with the title insurance underwriter(s) that the company has an agency contract with.

B. MONTHLY PROCEDURES

1. The Company General Counsel reviews the Title License Log monthly to determine if any licenses are due for renewal within the next 30-60 days and to determine if any individuals need to take classes to ensure compliance with Continuing Education (CE) requirements.

2. The Company General Counsel ensures that individuals who are not yet compliant with CE requirements for licensing period have plans to attend classes that will fulfill requirements prior to expiration date.

3. The Company General Counsel applies for renewal of all licenses no later than thirty (30) days prior to the current expiration dates shown on the Licensing Log.

4. The Company General Counsel obtains copies of renewal licenses and places them in the Licenses folder.

5. The Company General Counsel notifies its underwriter(s) of any individuals or entities that should no longer be appointed.

Supporting Documentation: Copies of insurance licenses.

II. NOTARIAL SERVICES AND NOTARY LICENSE RENEWAL PROCEDURES

Paramount Title, LLC (“the Company”) shall use only currently licensed Notary Publics when Notary Public services are required in the conduct of the business of title insurance and settlement services.

The Company currently employs licensed Notary Publics who are utilized when Notary Public services are required.

As a result of the COVID-19 pandemic, New Mexico's Governor, Michelle Lujan Grisham issued Executive Order 2020-039 (which replaces Executive Order 2020-015) which allows for the use of real-time audio video technologies to satisfy the physical presence requirements under applicable law for notarial acts. Therefore, the Company has procured the necessary audio video hardware and software necessary to offer Remote Ink-Signed Notarization (RIN) and follows the aforementioned New Mexico Executive Orders permitting RIN of documents commonly executed in connection with real estate and mortgage transactions.

NOTE: In the event that a third-party signing professional is contractually retained by anyone other than Company (including the buyer or seller), the responsibility for verifying that the third-party signing professional meets applicable standards rests with that party.

A. NOTARY COMMISSION COMPLIANCE

1. A Notary Public License Log is maintained by the General Counsel for each Notary Public that is employed by the Company. Copies of the notary commissions issued by the New Mexico Secretary of State are maintained in a secure folder in the Company files.

2. The Company General Counsel reviews the Log regularly to determine if any licenses are due for renewal within the next 30-60 days and coordinate the notary commission renewal with the individual licensee.

3. The Company General Counsel ensures all necessary renewals are applied for no later than thirty (30) days prior to the current expiration dates.

4. The Company General Counsel obtains copies of notary renewal documents and places them in a secure folder.

5. If for any reason a Notary Public other than one employed by the Company is utilized due to circumstances beyond the Company's control, the outside Notary Public's current commission is verified by researching the applicable state Notary verification website/database. Documentation of the Notary Public's commission is maintained in the applicable settlement file.

III. ALTA POLICY FORMS LICENSE RENEWAL

Paramount Title, LLC shall comply with the American Land Title Association (ALTA) requirement that all issuing agents of title insurance maintain a Policy Forms License or an Occasional Use Waiver. Paramount Title, LLC is a current member of ALTA.

A. ANNUAL PROCEDURES

1. The Company General Counsel shall determine if the Company will remain a current dues-paying member of the American Land Title Association (ALTA). If it does,

the Company General Counsel will obtain a copy of the ALTA Membership Certificate and maintain it in a secure file. An ALTA policy forms license is included with ALTA membership; therefore, the ALTA Membership Certificate is evidence of the Company's policy forms license.

2. If the Company is not a current dues-paying member of ALTA, the Company General Counsel shall determine if the Company is eligible for an ALTA Occasional Use Waiver (i.e., if Company issued less than 50 title insurance policies in the previous calendar year). If the Company is eligible for the Waiver, the Company General Counsel shall apply for one and, once received, maintain a copy of it in a secure file.

3. If the Company is not eligible for an Occasional Use Waiver (i.e., if Company issued more than 50 title insurance policies in the previous calendar year), the Company General Counsel will either 1) apply for an ALTA membership or 2) apply for an ALTA Policy Forms License. Once the ALTA membership certificate or ALTA Policy Forms License is received, the Company General Counsel will maintain it in a secure file.

4. This procedure will be repeated each year prior to the expiration date of the current ALTA membership certificate, ALTA Policy Forms License or Occasional Use Waiver.

IV. BUSINESS ENTITY AFFILIATION FORM ON FILE WITH NEW MEXICO OSI

Paramount Title, LLC complies with OSI requirement that all insurance issuing agents file a Business Entity Affiliation Form (Affiliation Form 202B) whenever a licensed individual comes into, or leaves, the employ of a licensed insurance business entity.

A. COMPLIANCE PROCEDURES

1. The Company General Counsel ensures that all necessary Business Affiliation Forms are filed with OSI whenever an employee who is licensed by OSI is hired by, or ceases employment with, the Company.

2. The Company General Counsel maintains copies of business affiliation forms and places them in a secure folder.

BEST PRACTICE NUMBER TWO **ESCROW ACCOUNTS**

Definition: Adopt and maintain appropriate written procedures and controls for Escrow Accounts allowing for the electronic verification of reconciliation.

Purpose: Appropriate and effective escrow controls and staff training help title and settlement companies meet client and legal requirements for the safeguarding of client funds. These procedures help ensure accuracy and minimize the exposure to loss of client funds. Settlement companies may engage outside contractors to conduct segregation of trust accounting duties.

Paramount Title, LLC Policy and Procedures: All escrow funds are maintained in separate designated accounts which are reviewed for reconciliation discrepancies on a daily basis. These accounts are monitored under the following controls:

- Daily reconciliation of all debts and credits to the account as well as available balances using the latest version of Qualia settlement software;
- Positive Pay and ACH Debt blocks setup on all accounts;
- Open escrow balances and outstanding checks are reviewed by management on a weekly basis;
- Three-Way Reconciliations are completed on a monthly basis and reviewed for accuracy by management; and
- Appropriate authorization levels are set and maintained.

I. ESCROW ACCOUNT PROCEDURES AND CONTROLS

Paramount Title, LLC has internal controls in place that apply to all custodial and fiduciary accounts (“Escrow Accounts”) to meet client and legal requirements for the safeguarding of client funds and to minimize the exposure to loss of client funds.

The Company has several active Escrow Accounts that are established and maintained in accordance with state regulations and its agency underwriter contract. All client funds collected as a fiduciary are deposited into these accounts. The Escrow Accounts are maintained separate from all other Company accounts. The Company General Counsel maintains a log of all bank accounts in the Company’s name.

The Escrow Accounts are maintained at Wells Fargo, N.A., a financial institution whose deposits are insured by the FDIC. The accounts are titled and clearly identified as “Paramount Title, LLC NM Real Estate Trust Account” on all bank statements and bank agreements to confirm the fiduciary nature of the account; disbursement checks and escrow deposit tickets are identified as being from “Paramount Title, LLC.”

A. DAILY PROCEDURES AND CONTROLS

1. All funds collected from parties are deposited into the Escrow Account. Collected funds may be in the form of a wire, cashier’s check, personal check, ACH or e-

Check.

2. All checks received at settlement are restrictively endorsed "For Deposit Only" upon receipt. A separate deposit ticket with corresponding file number is prepared for each file and the deposit is made within twenty-four hours of receipt.

3. Funds are only disbursed after the collected funds have been deposited into the Escrow Account and irreversibly credited to it.

4. Incoming and outgoing wires/electronic transfers confirmations are maintained in each file.

5. Each check written out of the Escrow Account must reference the corresponding file number that it was written for. Copies of the checks are maintained in the file along with a current, detailed deposit and disbursement summary sheet.

6. All check stock is safeguarded in a secure, locked location that only authorized check signers can access. All check stock is accounted for by the Company General Counsel at the end of each business day.

7. Any instructions that the Company receives for specific handling of escrow funds from a particular party must be made in writing and kept in the transaction file. If a separate, interest bearing account is requested same will be established and be subject to the same procedures outlined here.

8. Inactive or dormant account disbursements must be approved by the Company General Counsel. This approval must be in writing and be maintained with the account's bank statements and reconciliations.

9. Disbursements from any file that is more than one hundred eighty (180) days old must be approved by the Company General Counsel. This approval must be in writing and be maintained in the file.

B. MONTHLY PROCEDURES AND CONTROLS

All bank fees including service charges and wire fees are reimbursed with funds from the Company's operating account.

II. ESCROW ACCOUNT AUTHORIZATIONS

Paramount Title, LLC ("the Company") has internal controls in place to ensure that only employees that have passed background checks are authorized to sign checks, initiate wires, and approve bank account transactions for all custodial and fiduciary accounts ("Escrow Accounts") and further that all Escrow Account transactions are initiated or approved only by such authorized employees.

Currently, Thomas W. Banner (General Counsel/Owner) is the only employee authorized

to initiate wire transfers, and all checks issued by the Company must be signed by Mr. Banner and one other authorized employee.

A. ESCROW ACCOUNT AUTHORIZATION PROCEDURES

1. At the beginning of each calendar year, the Company General Counsel/Owner considers if any additional employees should be authorized to approve financial transactions, sign checks and initiate wires for the Company's Escrow Account. At the same time, the Company General Counsel considers limits for each employee that would be so authorized.

2. Should additional employees be authorized, the Company General Counsel would create an Escrow Account Authorizations Log to be maintained for the entire calendar year with any authorized employees' names, respective authorizations, and limits.

3. All employees authorized to process Escrow Account transactions must undergo and pass a background check at the time of hiring and/or prior to being authorized. The background check will include criminal and consumer credit reports that cover a period of not less than five (5) years. Established employees with Escrow Account authorizations will undergo a background check at least every three (3) years. The results of the background checks will be maintained in a secure personnel file in the General Counsel's office.

4. When an authorized employee leaves the Company or when the Company General Counsel decides to cancel an employee's authority, all of their Escrow Account authority is canceled immediately; any necessary bank paperwork is completed immediately, and the Escrow Account Authorizations Log is updated.

5. The Company has the following controls in place to ensure that Escrow Account bank transactions are conducted by authorized employees only:

- The Company does not permit the use of signature stamps on Escrow Account checks;
- All checks require two "wet" signatures; one from the Company General Counsel and the other from the Escrow Officer assigned to the transaction involving the disbursed funds;
- All outgoing wires from Wells Fargo accounts require authorizations with password, voice recognition, and account number verifications; and
- All check stock is maintained in a locked cabinet so that only authorized employees have access to the checks.

6. Per the Company's instructions, the bank has a block on the Escrow Account for International Wire Transactions.

7. The Escrow Account is set-up with Positive Pay so that the bank only clears checks after verifying them with the Company's check register.

III. ESCROW ACCOUNT RECONCILIATION PROCEDURES

Paramount Title, LLC (“the Company”) shall have procedures and controls in place to ensure Three-Way Reconciliations are performed on all custodial and fiduciary accounts (“Escrow Accounts”) monthly basis; that same are reviewed and signed off by management and that appropriate follow-up is performed on outstanding and trial balance items.

A. DAILY PROCEDURES AND CONTROLS

1. When the Company conducts a settlement, all funds collected are deposited into the Company’s Escrow Account.

2. Funds are only disbursed by an authorized employee after they have verified that the collected funds have been deposited and irreversibly credited to the Account and that the collected funds are sufficient to cover the disbursements.

3. A separate receipt and disbursement ledger is printed and maintained in each settlement file detailing every receipt and disbursement including date, amount, payee/payer, and description.

4. The ledger should indicate that the file balances (Receipts = Disbursements) or there should be documentation to support any difference (i.e. escrow agreement for funds being held, notes in the ledger to explain any other issues).

5. The Company General Counsel or their designee performs a daily reconciliation through Qualia of all Escrow Account receipts and disbursements.

B. MONTHLY PROCEDURES AND CONTROLS

1. The Escrow Account bank statement is delivered to and opened by the outside accountant who is responsible for performing a Three-Way Reconciliation of the Account. The outside accountant is not an authorized signer or wire initiator on any of the Company’s bank accounts.

2. Within ten (10) days of receiving the bank statement, the outside accountant completes a Three-Way Reconciliation of the account in accordance with approved Three-Way Reconciliation Procedures.

3. Deposits in transit and outstanding checks on the previous month’s Three-Way Reconciliation are checked against the current bank statement to determine what has cleared and what remains outstanding.

4. Upon completion of the Three-Way Reconciliation, the outside accountant prints the following reports:

- Summary page with Register/Book Balance, Trial Balance, Adjusted/Reconciled Bank Balance;
- Cleared Transactions/Proofing Register;
- Deposits in Transit;
- Outstanding Checks;
- Trial Balance (Unbalanced Files)
- Reconciling items;
- Voided Checks; and
- Outstanding checks from previous month.

5. Within one day of completion of the Three-Way Reconciliation Reports the outside accountant provides them to the Company General Counsel who reviews them for completeness and accuracy. The Company General Counsel signs and dates the front page to document their review.

6. The Company General Counsel, outside accountant, and staff work together to immediately research and resolve any of the following items reflected by the Reconciliation Reports:

- Deposits in Transit older than five (5) days;
- Incoming Wires in Transit older than two (2) days;
- Payoff and Proceeds checks outstanding for more than ten (10) days;
- Recording checks outstanding for more than thirty (30) days;
- Checks for taxes and/or hazard insurance outstanding for more than thirty (30) days;
- Underwriter premium checks outstanding for more than sixty (60) days;
- All other checks outstanding for more than ninety (90) days; and
- Reconciling items.

Documentation of all resolved items is maintained with the statement and reconciliation reports.

7. Any escrow shortages are immediately funded from the operating account.

8. All bank fees are reimbursed on a monthly basis from the operating account.

9. Copies of the bank statement and Three-Way Reconciliation Reports are made available electronically to the Company's title insurance underwriter or OSI upon request.

10. The Company General Counsel periodically reviews cancelled checks and the check register for unusual items.

C. ANNUAL PROCEDURES

Each year the Company General Counsel and outside accountant review the outstanding

checks and file ledger balances for reissue or escheatment to the State as required by law.

BEST PRACTICE NUMBER THREE

PRIVACY AND INFORMATION SECURITY

Definition: Establish and maintain a written privacy and information security program to protect Non-Public Personal information as required by local, state, and federal law.

Purpose: Federal and state laws (including the Gramm-Leach-Bliley Act) require title companies to develop a written information security program that describes the procedures they employ to protect Non-public Personal Information. The program must be appropriate to Company's size and complexity, the nature and scope of Company's activities, and the sensitivity of the customer information Company handles. A Company evaluates and adjusts its program in light of relevant circumstances, including changes in Company's business or operations, or the results of security testing and monitoring.

Paramount Title, LLC Policy and Procedures: Paramount Title, LLC ("the Company") has a comprehensive security program designed to ensure that all necessary information and data security safeguards are in place and that they adequately address the requirements of both the Graham-Leach-Bliley Financial Modernization Act ("GLBA"), New Mexico statutes, and the New Mexico Administrative Code. All employees of the Company are expected to contribute to this program and report any incidents that may affect the security of the organization's information systems. A copy of Paramount Title's current Privacy Policy is available in [Appendix F](#).

The following policies are addressed within Paramount Title, LLC's Privacy Policy, and Information Security Policy.

- Controlled access to physical and electronic storage as well as secure destruction of physical documents
- Secure transmission of information
- Monitoring of third-party service providers' access
- Physical entry controls to prevent unauthorized access
- Network guidelines and access controls, including restrictions on user authentications and authorization
- Remote access controls and restrictions
- Up-to-date virus management software and firewall controls against malicious software, viruses, and unauthorized websites
- Business Continuity Plan for disaster preparedness
- Security Incident Reporting and Resolution
- Background checks on all personnel
- Training of employees to ensure compliance with program
- Restrictions and the appropriate uses of company systems

I. PRIVACY AND INFORMATION SECURITY PROCEDURES

The Company has created and adopted written procedures and an Information Security Program to ensure that it is compliant with federal, state, and local laws and able to best

protect its clients' confidential, personal, and/or Private Information. These procedures specifically addresses protection of non-public Private Information and provides direction for managing and protecting the confidentiality, integrity, and availability of all of the Company's information assets. Following are additional components of the Company's Information Security and Privacy Management policies.

1. Background Checks / Hiring Practices - The Company seeks out and hires only qualified employees with verified education credentials, work history and reputations. The Company performs background checks, including criminal history, on employees and temporary staff that have access to Personal Information. Such employees will have a background check at least every three (3) years. The results of background checks are maintained in the employee's personnel file as per the Company's document retention and destruction guidelines.
2. Acceptable Use of Information Technology Policy - The Company's Acceptable Use of Information Technology Policy is outlined herein describing the ways and circumstances under which employees may use Company owned technology.
3. Access to Private Information - Private Information held by the Company is restricted to only those employees whose job duties require access to this information. Access to Private Information is granted and authorized by the Company's General Counsel. These access rights are reviewed annually to ensure the correct permissions are granted to the Company's employees.
4. Clean Desk and Clear Screen Policy - The Company has a Clean Desk and Clear Screen Policy.
5. Data Security- Removable Media - The Company has a removable media policy outlined that restricts the use of USB devices, CD/DVDs, writeable drives, and other storage devices.
6. Record Retention and Disposal Policy - The Company has a Record Retention and Disposal Policy.
7. The Company's Information Security and Privacy Management has been approved by the Company General Counsel. It is communicated to all employees annually by the office manager and all employees are required to sign an acknowledgment of their receipt. The acknowledgment is retained in each employee's personnel file. The Company ensures that all employees are aware of their individual roles in the protection of Private Information by routine staff meetings, training sessions and continuing education seminars presented by our underwriters.
8. Policy Review - The Company's Information Security and Privacy Management Policies are reviewed annually to determine if updates are necessary to reflect changes in operations, legal and regulatory requirements, industry best practices and available technology. Changes to any of the Company's policies are tracked and maintained as further described in that Policy Review Procedures Policy.

9. Customer Privacy Notice - The Company has a Customer Privacy Policy Notice, which is provided to customers with the delivery of the title commitment by email.

10. Privacy Statement - The Company's website contains a Privacy Statement, which includes details regarding information, if any, that may be collected.

A. INTERNET SECURITY POLICY REVIEW PROCEDURES

Paramount Title, LLC ("the Company") reviews and updates all Information Security and Privacy Management Policies on a regularly scheduled basis to determine if updates are necessary to reflect necessary to reflect changes in operations, legal and regulatory requirements, industry best practices and available technology.

1. Review Team - The Policy Review Team will, on an annual basis and more frequently when required, meet to review all Information Security and Privacy Management Policies. The Policy Review Team will consist of the Company General Counsel and Capitol Computer & Network Solutions, our outside IT Consultant. Changes to the policies are only made after these meetings.

2. Review Criteria - A variety of criteria will be used by the Policy Review Team at the time of review. These items will include reviewing the policy to determine if changes to any of the following have been made:

- Company operations;
- Legal and Regulatory requirements;
- Industry Best Practices; and
- Available Technology.

3. Communication - Upon completion of the review and necessary revisions to any Company policies, updated policy versions will be placed in the company's official policy manual, replacing the outdated version. The updated policies will be communicated to all staff members, as well as any clients, when appropriate. All staff members are required to review and acknowledge receipt of the new policy manual via the company's policy acknowledgment form. Said acknowledgment will be retained in the employee's personnel file.

B. RISK IDENTIFICATION AND ASSESSMENT PROCEDURES

The Company has created and adopted written policies and procedures with the goal of identifying and assessing current or potential risks which could have a negative effect on the Company, its systems, or clients, including risks that could compromise Private Information held by the Company. Private Information is defined under this policy as any privileged or proprietary information which, if compromised through alteration, corruption, loss, misuse, or unauthorized disclosure, could cause serious harm to the Company. These procedures include the regular review by Policy Review Team of the Company's operational functions to identify potential or actual risks. This review will include

examination of:

- The types of Private Information the Company maintains
- The location in which Private Information is stored
- How Private Information can be accessed
- Which employees have access to Private Information
- Which non-employees have access to the office

Risk Assessments performed by Policy Review Team includes internal and external risks. The risk analysis review encompasses the Company's entire computer networking system(s) and physical security tools including but not limited to the following:

- Alarm system;
- Entrance and interior door locking mechanisms; and
- Locks on file cabinets.

All employees play a major role in the identification and elimination of risks to the Company. Employees receive training on ways they can help identify risks and ways to avoid compromising the Private Information for which they have access. Employees of the Company may create unintended risk while performing normal business functions for the Company. The Company takes steps to limit the risk created by employees which may include:

- Limiting the amount of information each employee may access to only that information needed to perform the duties associated with the employee's position;
- Reviewing how information is communicated to clients, lenders, vendors, and all other third parties involved in the transaction to ensure that transmission is safe, encrypted, and otherwise protected during transit;
- Identifying ways information is and may be protected when it is accessed outside of the Company's office(s) by Company employees, including mobile devices, laptops, etc.

The Company General Counsel is responsible for authorizing each employee's access to Private Information. The Company has controls in place to prevent improper access of Private Information by all employees who have not been granted the appropriate security permissions. These controls are regularly tested by the Company General Counsel or their designee.

The Company's General Counsel documents the risk analysis results and records changes made to the Company's information security network or operations to eliminate or reduce risk for the Company. This documentation, including all change management records, is retained in a designated file as per the Company's document retention and destruction guidelines.

C. EMPLOYEE TRAINING, MANAGEMENT, AND RESPONSIBILITIES

All Company employees have the responsibility to understand how to protect confidentiality, integrity, and availability of information systems. Awareness training improves the user's awareness of the company's Information Security policies and procedures and the need to protect information resources. Training makes the system users aware of their role in protecting information and their security responsibilities, defines the user's role in the security process, and helps the user develop skills and knowledge so that they may perform their jobs securely.

New employee training: All employees hired by the Company or individuals employed on a temporary basis will undergo specific training programs relating to the Company's Information Security Program including the following subjects:

- Security Awareness;
- Privacy Issues;
- Clean Desk and Clear Screen Policy;
- Identification of Private Information
- Responsibilities of every employee to protect Private Information, including controls and procedures to prevent Private Information disclosure to unauthorized parties;
- Consequences for non-compliance;
- Acceptable use of the Company's computer system, network, equipment, and devices;
- Proper use of computer networks and passwords; and
- Methods for proper disposal of documents containing Private Information.

New employees are given copies of all of the Company's policies and procedures relating to Information Security, Protection of Private Information, and Acceptable Use of Information Technology on the first day of employment with the Company. An acknowledgment of receipt and comprehension of these procedures will be executed by the employee and maintained by the Company General Counsel or their designee.

All employees of the Company will be provided with updates to these policies immediately after the updates are made to these policies and procedures. Employees will receive training, at least annually, on the Company's information security policies and procedures, and will complete a training acknowledgment form every time an updated training session is completed. An Information Security Training Log is maintained by the Company General Counsel or their designee.

D. INFORMATION SECURITY PROCEDURES

1. Statement of Responsibility - The Company General Counsel is responsible for the administration of this policy and responsible for maintaining procedures; user access, updating systems and documentation; providing appropriate support and guidance; and reviewing the policy annually. Company employees are responsible for adhering to the policies and procedures for notifying the Company General Counsel of any issues or violations.

2. Violations - Employees found to be in violation of this policy are subject to disciplinary action that is commensurate with the severity of the violation.

3. User Access - The Office Manager and Company General Counsel determine the level of access for each employee of the Company and coordinate same with the staff of Capitol Computer & Network Solutions. Access is limited to only employees that need access to carry out their daily job functions. Access privileges are reviewed annually by the Company General Counsel. Access privileges are adjusted immediately anytime an employee is terminated or changes job functions and anytime contractor or third-party severs its relationship with the Company.

4. User IDs and Passwords - Unique user IDs and passwords are issued to all employees accessing the Company's systems. Each employee must safeguard their User ID and Password from all other persons including other employees. Compromised passwords must be reported immediately to the Company General Counsel. Systems are configured to record the user ID used to access them.

5. Data Backup - Servers are backed up daily via cloud-based Qualia settlement software in accordance with the terms of our agreement. Local storage NAS is also backed-up daily through encrypted Amazon Cloud Services at multiple redundant off-site data storage facilities.

6. Physical Security - The Company limits access to its office to only those individuals who require access for legitimate business functions. Access to the office is limited including unique locks, keypad access, restricted access, and alarm system. Restricted areas are marked by signage restricting access to authorized personnel only. If an employee with access rights is terminated or otherwise leaves employment of the Company, the Company General Counsel retrieves all office keys and terminates all access and passwords through administrative rites.

7. Electronic Security - Security Controls are in place to prevent unauthorized access, misuse, or corruption of Private Information by secure firewall tools with detection and prevention features, complex password protocols, anti-virus software and secure email transmission. These controls are in place for the database/network access, email systems for the electronic transmission of the data as well as storage.

8. Equipment - Employees may be granted use of the Company's equipment, including items such as laptops, smartphones containing the Company's email or other network information. The Company prohibits the use personal equipment to access the Company's data. All employees who have the authority to use equipment belonging to the Company off-site must immediately report loss or theft of these items to the Company General Counsel.

9. All equipment, hardware and software assigned to employees, contractors or other third parties must be returned immediately upon their separation or termination from the Company.

10. Firewall Protection - The Company uses firewalls to protect all network entry points, and the Company's network is continuously monitored by a third-party network security firm which receives and responds to any alerts or intrusions detected.

11. Anti-Virus Protection - The Company uses anti-virus Software to protect the Company's network systems (servers, workstations, and laptops) and data against malicious threats. Scans are set to run nightly with updates pushed automatically to the server level as well as to individual workstations.

12. Remote user access ("Remote Access") - Remote Access to the Company's network and/or data is strictly controlled. All access to the Company's systems are logged by time, date, username, and IP address.

13. Separation of Duties - The Company's outside IT service provider is not authorized to perform transactions within any of the Company's systems that contain Private Information.

14. System Modifications - The Company's outside IT service provider is responsible for performing regular updates to install patches and other software updates/fixes designed to keep systems current and to mitigate known security flaws. New or updated technology, including hardware or software, is tested before it is implemented. Updates made to software or hardware is documented and maintained by the IT service provider.

E. ACCEPTABLE USE OF INFORMATION TECHNOLOGY PROCEDURES

Paramount Title, LLC ("the Company") has the following Acceptable Use of Information Technology Policy to ensure that the use of the Company's electronic based communication systems and business equipment including e-mail, voice mail, and internet access and accounting systems is consistent with the business interests of the Company and in the interest of its clients.

1. Communications - All communications are the property of the company. They are business records and may have legal and operational effects identical to those of traditional hard copy documents. Accordingly, all electronic communications should be treated as though they may later be viewed by others. Employees should have no expectation that any information transmitted over company facilities or stored on company computers is or will remain private. The company may access, monitor, disclose or distribute any communication associated with any electronic equipment or system employed by the company. It is also possible that non-employees may gain access to company communications through on-line services or specific access to our hardware or systems. For these reasons, it is important to use good judgment in creating, distributing, and retaining e-mail, voice mail, internet/intranet or other electronic documents and messages.

2. Passwords - Password protection is required for any of your network communications, and employees must follow all protocols and procedures. Never

disclose your password to anyone unless that person has the proper clearance and a legitimate need to know. The Company General Counsel or their designee may authorize use of an employee's password during temporary absences for illness or vacations. Passwords must be changed upon the employee's return to work.

2. Conditions of Use of the Information Technology System - The term Information Technology System is used as a synonym for computers and computer networks used to store, retrieve, transmit, or manipulate data, but it also encompasses other information distribution technologies such as television and telephones. The Information Technology Systems are the property of the company, and users should understand that any use of these systems is not private or confidential.

3. Prohibited Use of Information Technology Systems

- Transmitting, storing or accessing obscene, vulgar, profane, insulting or offensive material or messages (such as ethnic slurs or sexually explicit words, photographs and/or drawings) or other material that could be construed as disparaging to any person based upon that person's sex, race, age, national origin, disability or religion.
- Receiving, printing, transmitting, or otherwise disseminating proprietary data, client information, PII (personal identifiable information) company secrets, or other confidential information in violation of company policy or proprietary agreements is strictly prohibited. Downloading inappropriate material such as picture files, music files, or video files for personal use is also strictly prohibited.
- The Company strictly prohibits the use of all Company equipment (internet, phone, and email system) for personal use. The Company permits the use of personal cell or smartphones during breaks and lunch time.

4. Monitoring Usage of Information Technology Systems - The Company may, from time to time at its sole discretion, monitor use of the Information Technology Systems. Such monitoring may include the interception of telephonic communication and voicemail messages, printing and reading data files (including personal documents, E-mail, messages, and attachments) and monitoring internet usage (including a review of time spent on the internet and a review of specific web sites visited).

5. Restricted Internet Traffic - The Company's Internet system is restricted and intended only for business purposes. The Company strictly prohibits the use of the Company internet system by employees for personal use. Employees are permitted to access the internet through personal smartphones or tablets during breaks and lunchtime. Our firewall restricts access to questionable sites and content.

6. Social Media Communication Policy - The Company prohibits employees from communicating on social media in the Company's name. This policy applies to all forms of social media, networking on the Internet, radio, television or in print media. It is the company's right to protect itself from unauthorized disclosure of information or distribution of information or opinions that are detrimental to the company.

7. Software Code of Ethics - Unauthorized duplication of copyrighted computer software violates the law and is contrary to our company's standards of conduct. We disapprove of such copying and recognize the following principles as a basis for preventing its occurrences:

- The making or using of unauthorized software copies is not permitted under federal copyright law; and
- Legally acquired or purchased software required by the company will be provided to meet the legitimate software needs in sufficient quantities for company computers.

8. Violations - Employees who violate Company policy are subject to disciplinary action including training, probation, and termination.

F. CLEAN DESK AND CLEAR SCREEN POLICY

All employees are responsible for following the Clean Desk and Clear Screen Policy outlined herein to reduce the threat of a security breach, fraud and information theft of electronic and physical documents located on the Company's premises.

1. Purpose - This policy will establish a culture of security and trust for all employees and clients by ensuring the company is taking the appropriate responsibility for the Private Information in its care. It reduces the risk of unauthorized access to, loss of, or damage to information, thereby reducing the chance of breach of client confidentiality and theft of intellectual property. Additionally, a clean desk will provide a professional and positive image to office visitors, including clients, by ensuring an appropriate office appearance while meeting health and safety considerations.

2. Responsibilities - The Company General Counsel is responsible for implementation and enforcement of this policy. All employees must comply with the terms of this policy as they pertain to their specific job responsibilities.

3. General Requirements - Each employee must:

- Lock, with Password Protection, the computer system every time a workstation is left unattended for any period of time.
- Set the computer's automatic locking feature to lock, with Password Protection, the idle computer after 15 minutes of system inactivity.
- Log off the computer system at the end of each workday.
- Remove all files, documents, and/or Information Technology (IT) devices containing Confidential Information, as further defined in the Company Information Security Policy, from the workspace and lock these items in a drawer when the workstation is left unattended or at the end of the workday. The key for the locked drawer is to remain with the employee at all times and may not be left unattended. A second key for the locked drawer will remain with the Company General Counsel and may not be left unattended.
- Lock file cabinets or drawers containing Confidential Information when not in use.

- Keep the workstation and any other accessible areas clear from Sensitive Information.
- Sensitive Information is any privileged or proprietary information which, if compromised, could cause serious harm to the Company. This Sensitive Information may include, but is not limited to, user ids, passwords, and account numbers. This Sensitive Information is maintained and kept secure in the employee's locked desk and with a copy maintained in the Company General Counsel's secure file cabinet.
- Immediately remove printed documents that may contain Confidential Information from printers, copiers and/or facsimile machines and place these items into the appropriate secured physical file. These items may be temporarily secured in the employee's locked drawer referenced above until the time when said file is actively being processed but must be put into the appropriate file before the end of the business day.
- Shred any document containing Confidential Information as soon as the document is no longer needed via our shredding vendor or the company shredding machine located in the office.

4. Enforcement - Employees are expected to follow the spirit and intent of this policy. Periodic sweeps of work areas may be conducted by the Company General Counsel or a designee to verify adherence to this policy. Violations of this policy may result in disciplinary actions, up to and including termination.

5. Revisions - This policy will be reviewed on an annual basis and appropriate changes will be made accordingly.

G. DATA SECURITY - REMOVABLE MEDIA

1. The Company prohibits the use of any removable media (i.e. - CDs, DVDs, Flash/Thumb drives) for the purpose of making a copy of Company data. Exceptions may be granted by General Counsel. Any such exceptions must be documented. Any removable media device should be encrypted to prevent access by unauthorized parties.

2. CDs and Flash/Thumb drives should be stored out of sight when not in use. If they contain sensitive or confidential data, they should be locked in a secure location.

3. CDs and Flash/Thumb drives should be kept away from environmental hazards such as heat, direct sunlight, and magnetic fields.

4. Critical computer equipment is protected by uninterruptible power supply (UPS). Other computer equipment should be protected by a surge suppressor.

5. Environmental hazards to hardware (i.e. food, liquids, smoke, high or low humidity and extreme heat or cold) should be avoided.

H. INFORMATION SENSITIVITY POLICY

All employees should familiarize themselves with the information labeling and handling guidelines that follow this introduction. It should be noted that the sensitivity level definitions were created as guidelines and to emphasize common sense steps that you can take to protect the Company Private Information, as defined below, (e.g., Confidential Information should not be left unattended in conference rooms).

1. INFORMATION CLASSIFICATION

All information is categorized into two main classifications:

a. PUBLIC INFORMATION

“Public Information” contains all information that has been declared public knowledge by someone with the authority to do so and can freely be given to anyone without any possible damage to the systems.

b. CONFIDENTIAL INFORMATION

“Confidential Information” contains all other information. It is a continuum in that it is understood that some information is more sensitive than other information and should be protected in a more secure manner. Included is information that should be protected very closely, such as trade secrets, development programs, potential acquisition targets, and other information integral to the success of our company. Confidential Information also includes information that is less critical, such as telephone directories, general corporate information, personnel information, etc., which does not require as stringent a degree of protection.

b (i). THIRD PARTY PRIVATE INFORMATION

A subset of Confidential Information is “Third Party Private Information”. This is Private Information belonging or pertaining to another corporation or individual which has been entrusted to the company by that third party under non-disclosure agreements and other contracts. Examples of this type of information include everything from joint development efforts to vendor lists, customer orders, and supplier information. Information in this category ranges from extremely sensitive information to information about the fact that we have connected a supplier / vendor into a network to support our operations.

Company employees are encouraged to use common sense judgment in securing Confidential Information to the proper extent. If an employee is uncertain of the sensitivity of a particular piece of information, then the employee should contact the appropriate manager.

2. INFORMATION SENSITIVITY

The Sensitivity Guidelines below provide details on how to protect information at varying sensitivity levels. Use these Sensitivity Guidelines as a reference only, as Confidential Information in each category may necessitate more or less stringent measures of

protection depending upon the circumstances and the nature of information in question.

- Minimal Sensitivity: General corporate information; some personnel and technical information. This information is to be designated and always treated as “Confidential”. All employees approved to view, and access Non-Public Information may have access to and process this information. This information may be sent outside the office by U.S. Mail, encrypted email, or overnight courier.
- More Sensitive: Business, financial, technical, and most personnel information. This type information is to be designated and treated as “Sensitive Confidential”. Access to and the processing of this information is restricted to employees assigned to process the file or task. This information may be sent outside the office to authorized recipients by encrypted email or overnight courier with a unique tracking number. This information should be destroyed/shredded at the earliest point when it is no longer needed. Violators will be subject to discipline including termination.
- Most Sensitive: Trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company is to be designated and treated as “Most Sensitive Confidential”. Access to and the processing of this information is only authorized by the Company General Counsel. This information may only be sent outside the office by the Company General Counsel or his approved designee. Violations to this section, whether deliberate or inadvertent, are subject to termination. Retention and destruction of this information is at the sole discretion and direction of the Company General Counsel.

3. INFORMATION SENSITIVITY AND COMPUTER USAGE

Computer use and access to Company maintained databases and software platforms, especially cloud-based systems, must be restricted so that in the event of an attempt to access corporate information, the amount of information at risk is minimized. The Company utilizes 2-Factor authentication protocols, IP address whitelisting, firewall tools with detection and prevention features, complex password protocols, anti-virus software, redundant encrypted network backup procedures and secure email systems to protect sensitive information.

Connections with third-party service providers are set up to minimize the information available to the third-party service provider. The company ensures that these third-party providers see only the information necessary to complete the contracted services.

Delivery of Sensitive Information - Sensitive information should be delivered in person or by secure encrypted email (i.e. via Qualia Connect).

Any employee found to have violated this policy may be subject to disciplinary action including training, probation, and termination.

4. RETENTION AND DESTRUCTION OF PRIVATE INFORMATION

The Company has created this Retention and Destruction of Private Information Procedure for all official documents containing, or suspected to contain, Private Information. All Company employees and contractors are informed of their responsibilities regarding the handling, protection, and destruction of Private Information prior to being assigned any job duties that involve handling of same.

Personally identifiable data, such as information provided by a customer on a form or application, information about a customer's transactions, or any other information about a customer which is otherwise unavailable to the general public, includes first name or first initial and last name coupled with any of the following: Social Security Number, driver's license number, state-issued ID number, credit card number, debit card number or other financial account number(s).

Documents with Private Information are obtained by the Company within the course of its normal business operations. When documents that may contain non-public personal information are determined to be no longer needed for the transaction or service for which it was provided will be destroyed by the company shredding machine.

Hard drives located in the Company's equipment, including computers and copiers, are removed, and physically destroyed before equipment is disposed or reused. Hard drives located in equipment that has been leased by the Company are removed and physically destroyed prior to being returned. All other information technology media including stand-alone hard drives, flash drives, or other types of removable media include physically destroying hard drives or scratching the surfaces and breaking into pieces.

Closed transaction files, or documents pertaining to those files, are retained in electronic format for a period of not less than fifteen (15) years. Upon full completion of the file, paper files are scanned into Qualia and are also stored on the Company NAS (with redundant, encrypted backup) with restricted access for a period of at least fifteen (15) years. After this retention period expires, old electronic files will be reviewed by the Company General Counsel for eligibility for destruction or deletion.

I. OUTSIDE SERVICE PROVIDERS POLICY

Third-party service providers utilized by the Company to assist with operation or other business functions, and/or to provide services for real estate transactions, may require access to non-public personal information in order to perform the services they provide. These vendors may include but are not limited to:

- Title Examiners
- Surveyors
- Financial Institutions
- Title Insurance Underwriters (Auditors and Agency Representatives)

The Company performs reasonable, due diligence checks on all vendors prior to use, which may include:

- Background checks and/or reference checks;
- Review of information policies and procedures, financial resources, and references;
- Confidentiality Agreements; and
- Review of outside audits or Statement on Standards for Attestation Engagements (SSAE- 16)

The Company prefers to use known industry leaders for services provided. Vendors are required to maintain errors and omission coverage which, at a minimum, meet any state, industry, and contractually obligated requirements.

All third-party service providers are required to execute a Confidentiality Agreement addressing the security and protection of Private Information before any services are provided and before access to potential Private Information is granted.

All third-party vendors are required to maintain, at a minimum, the same information security procedures as the Company. The procedures include requirements for the vendor to maintain a written Information Security Program.

The Company General Counsel is responsible for managing all vendor relationships. These responsibilities include oversight of each vendor and ensuring that all of the vendor's insurance coverage declaration records maintained by the Company are kept up to date. This type information is retained in a designated file in the Company General Counsel's office. The Company General Counsel or their designee monitors the vendor's service level, pricing, and contractual obligations to ensure that the vendor is performing services securely, accurately, and professionally. Vendors are contractually obligated to the Company to remedy privacy or other performance requirements; otherwise they risk termination of services.

J. DATA BREACH INCIDENT REPORTING POLICY

The Company has tools in place to limit its exposure to incidents involving data breaches or other inappropriate access to sensitive information including firewall tools that log any intrusion attempts and provides an IP address including a timestamp, anti-virus software for virus detection and prevention and SSL encryption prevents personal information from being transmitted in clear text avoid security incidents. The Company monitors external threats (attacks/intrusions) to its information network and systems by continuous monitoring by an outside IT service provider.

All employees are required to attend training regarding incident response as part of their Information Security Program training. This training includes information on how actual and suspected data breach incidents are to be reported, investigated, and handled. Employees receive copies of all written policies and procedures relating to incident response as part of this training program.

When a potential attack or intrusion is discovered, the Company's outside IT service

provider receives notifications and responds according to the level of threat detected and the Company's General Counsel is alerted. The Company's outside IT service provider is responsible for collecting data for the incident response including audit trails and access logs. Investigations of incidents are handled by Company's outside IT service provider and when appropriate, escalates information relating to these attacks the Company General Counsel to determine whether the incident must be officially reported per federal, state, and local laws and/or contractual agreements.

K. BUSINESS CONTINUITY AND DISASTER RECOVERY PLAN

Paramount Title, LLC ("the Company") has adopted the Business Continuity and Disaster Recovery procedures outlined herein as part of the Company's Information Security Program. These procedures are in place to assist the Company in a timely resumption of business activities should it experience an unexpected information system failure, including emergency or disaster situations.

The Company's Disaster Recovery Plan provides written instructions that address the prevention of interruptions to business activities and the timely resumption. It includes procedures to address recovery of electronic data from loss, damage, theft, or compromise and includes plans for all of the Company's critical business processes, physical facilities, and equipment. Specific timelines for tasks to be completed and services recovered are outlined in the Disaster Recovery Plan and are prioritized by order of importance.

The Disaster Recovery Plan has been distributed to all employees that may be called upon to play an active role during an emergency situation. These employees, and their roles for executing the plan during a disaster recovery event, are further outlined within the Disaster Recovery Plan.

The Company's Disaster Recovery plan includes current contact information for all employees, contractors, vendors, and clients. It is the responsibility of the Company General Counsel or their designee to keep the Disaster Recovery Plan's contact information updated at all times.

The Disaster Recovery Plan includes a schedule of tasks and list of services (in order of priority) to be recovered. It also contains information regarding the testing schedule of the plan, including types of tests that may be performed and the frequency for which testing is completed. Documentation of testing performed for the Disaster Recovery Plan is included within the policies and procedures of the plan.

1. DISASTER RECOVERY PLAN

Paramount Title, LLC ("the Company") has adopted the Business Continuity and Disaster Recovery procedures outlined herein as part of the Company's Information Security Program located in Appendix D. These procedures are in place to assist the Company in a timely resumption of business activities should it experience an unexpected information system failure, including emergency or disaster situations.

BEST PRACTICE NUMBER FOUR **SETTLEMENT POLICIES AND PROCEDURES**

Definition: Adopt standard real estate settlement policies and procedures that help ensure compliance with Federal and State Consumers Financial laws as applicable to the settlement process.

Purpose: Adopting appropriate policies and conducting ongoing employee training helps ensure Company can meet state, federal, and contractual obligations governing the Settlement.

Paramount Title, LLC Policy and Procedures: Paramount Title, LLC'S use of software and technology allows us to track a file through each step of the closing process and provide complete transparency of the work being done on each file. As such we are able to verify that each part of the closing process adheres to accurate company procedures and that check, and balances are in place to monitor these procedures by:

- Obtaining accurate information from parties prior to a closing;
- Maintaining current premium rate information;
- Reviewing closing instructions;
- Processing mortgage payoffs;
- Accurately disbursing proceeds and handling escrow funds;
- Timely and accurate recording of documents; and
- Conducting updated title searches prior to each settlement and/or recording.

I. RECORDING PROCEDURES

Paramount Title, LLC (“the Company”) has procedures to ensure the timely recording of all documents related to settlements conducted by the Company. These procedures meet all legal and contractual obligations as well as State, Federal, local, and industry standards and regulations that govern the settlement process.

The Company issues title insurance policies in connection with settlements conducted by the Company. The Company is responsible for the recording of all documents from the settlements it conducts.

Documents that need to be recorded from each settlement are delivered to the appropriate governmental office within twelve (12) hours of settlement or disbursement. Prior to such delivery the following procedures are followed:

1. Drafts of all documents (Deeds, Mortgages, etc.) that need to be executed and recorded pursuant to the title insurance commitment are reviewed and proofed by the General Counsel prior to settlement for the following:

- Documents are in appropriate format (size, margins, etc.) and correct order for the County/State;
- Document Date;

- Amount of Consideration;
- Names of grantee, grantor, mortgagor, mortgagee, etc.;
- Marital status of natural persons;
- Tenancy;
- Representative capacity of individuals signing on behalf of entities;
- POA, Trust, Probate, Estate language, if applicable;
- Legal Description of the property;
- Parcel I.D.;
- Signatures and Witnesses;
- Notary/Acknowledgement clauses are complete and accurate;
- Riders;
- Attorney/Preparer Certification;
- Affidavits

Any errors or omissions discovered with the document drafts are corrected prior to settlement.

2. Upon completion of each settlement conducted by the Company, all check(s) for recording fees, recording taxes and transfer taxes are deposited in the Company Escrow Account.

3. Within eight (8) hours of settlement, the General Counsel reviews all of the executed documents to make sure they are the same as the drafts that were approved and that they were fully and properly executed and that they are ready for recording.

4. The Escrow Officer balances the file and arranges payoffs.

5. If any errors or omissions are discovered with the documents or checks, immediate measures taken to correct them.

6. Upon approval of the documents and check(s), copies are made for the file and transmitted via electronic means (i.e. Simplifile) to the county recorder's office.

7. The Company tracks all documents sent for recording to ensure timely recording. The Company retains all files during the recordation process in a designated locked file cabinet.

8. The Escrow Officer and/or General Counsel monitors/reviews the outstanding check list and custom reports generated from Qualia's reconciliation software that identifies checks outstanding for more than ten (10) days. The Escrow Officer requests a Post-Closing update (rundown) to the title search to verify proper recordation and indexing and to determine any intervening matters exist.

9. If a document is rejected for any reason, it is returned immediately to the Escrow Officer who takes the necessary measures to correct the problem. Once the problem has been corrected, the document is resubmitted without delay.

10. All documents are returned to the Company after recording. The Escrow Officer reviews the recorded documents to make sure they were recorded in the proper order and properly indexed by the county clerk.

11. Copies of the documents with the recording stamps (date, time, book, and page/instrument no.) are made for the file.

12. The policies and documents are prepared for delivery to the insured.

13. The Company General Counsel reviews the Company's Document Recording Log monthly to ensure all documents are recorded. Any exceptions are addressed and resolved immediately.

II. PRICING PROCEDURES

Paramount Title, LLC ("the Company") has procedures to ensure that customers are charged the correct title insurance premium and other charges for settlement services provided by the Company. Premiums and charges for services are determined by legal and contractual obligations as well as State, Federal, local, and industry standards and regulations which govern the settlement process.

1. The Company's Escrow Officer assigned to a transaction prepares the Settlement Statement for the transaction (unless closing is being handled by a bank's in-house closing staff, and Paramount is only providing title insurance) and are responsible for ensuring the correct title insurance premium is charged for each transaction. At all times, Escrow Officers maintain access the Company's Qualia settlement software, which is integrated with the Underwriter's on-line rate calculator, as well as complete copies of the current underwriter's Rate Manual(s). Escrow Officers are familiar with premiums, rules, and discounts. Upon notification from the state or an underwriter that changes have been made to the Rates, the Escrow Officers are immediately provided with the new Rate Manual and the Company's settlement service software vendor is contacted to confirm they have updated their software.

2. The Company's underwriter's rates are incorporated into the Company's Qualia settlement service software. The rates are identical to the ones provided to the settlement service software vendor by the underwriter. The software calculates the policy premium based on the policy types, amounts, rate type and endorsements entered by the Escrow Officer.

3. The Escrow Officers also utilizes the underwriter's online rate calculator program to determine/double check the proper charges to collect on the Closing Disclosure or HUD-1 settlement statement for the policy(ies), endorsements and Closing Protection Letter, if any. A copy of all documents created by the Escrow Officer is maintained in the electronic file to document the calculations.

4. Prior to settlement, each buyer/borrower is provided with notice of any

Reduced Rates which provides them with notice of documentation that will entitle them to a reduced rate if the documentation is provided to the Company prior to settlement. If the buyer/borrower provides such documentation prior to settlement, the Escrow Officer ensures that the applicable reduced rate is charged on the Closing Disclosure / HUD-1 settlement statement. Rate calculations from Qualia and the underwriter are cross-checked to verify that the calculations are accurate.

5. The Company's Escrow Officers are also responsible for ensuring all additional fees the Company collects for services (i.e. Settlement Fee, Overnight Delivery Costs, Wire Fees, Tax Payments, etc.) are correctly charged for each transaction. Fees and any applicable gross receipts taxes payable to third party service providers are charged in accordance with the third-party service provider's invoice.

6. A post-settlement review of charges is performed by the General Counsel and the outside accountant when preparing the monthly premium report of remittances due to the underwriter. If any over-charges are discovered, the Company General Counsel reviews the file. If the Company General Counsel confirms there was an over-charge, a refund check is issued immediately and same is documented in the file.

7. If the Company's underwriter notifies the Company of an over-charge discovered during their processing of premiums and/or policy copies, the Company immediately issues a refund check and documents same in the file.

III. RECORDING AND PRICING TRAINING

Paramount Title, LLC ("the Company") has policies and procedures relating to document recording and pricing of title insurance policies and settlement services to ensure a settlement process that is compliant with legal and contractual obligations as well as State, Federal, local and industry standards and regulations. All employees involved in the settlement process shall undergo initial and ongoing training with respect to the Company's recording and pricing procedures.

New employee training: All employees hired by the Company will undergo specific training programs including:

- Use of the Company's settlement software (i.e. Qualia, Simplifile, etc.);
- Document recording policies and procedures; and
- Pricing policies and procedures

New employees whose duties will include recording functions will have additional training on specific recording functions, including the use of recording checklists. These employees are given a copy of all the Company's recording policies, procedures, and recording checklists before they begin performing these duties for the Company.

New employees whose duties will include pricing functions, including post-closing rate/fee pricing verification functions, will receive training on quality control checks and other rate pricing guidelines. These employees are given a copy of all the Company's policies and

procedures and will receive specific training on rate manuals, settlement software, online calculators, and OSI rate orders before they begin performing these duties for the Company.

BEST PRACTICE NUMBER FIVE **TITLE PRODUCTION**

Definition: Adopt and maintain appropriate procedures for the production, delivery, reporting and remittance of title insurance policies designed to meet both legal and contractual obligations.

Purpose: Adopting appropriate procedures for the production, delivery, and remittance of title insurance policies helps ensure title companies can meet their legal and contractual obligations.

Paramount Title, LLC Policy and Procedures: Paramount Title, LLC's policy is to deliver all policies to customers within the guidelines set forth by the underwriters' agency contracts (generally by the end of the first full month following closing). Policies are prepared and delivered following review that all terms and conditions of the title insurance commitment have been satisfied and all closing documents and necessary releases have been recorded. The Company is an authorized title insurance agency/agent for Fidelity National Title Insurance Company, Commonwealth Land Title Insurance Company, and Stewart Title Guaranty Company.

I. TITLE POLICY AND DELIVERY PROCEDURES

Paramount Title, LLC ("the Company") shall issue and deliver all title insurance policies to the insured parties within forty-five (45) days of the later of (i) the date of settlement, or (ii) the date that the terms and conditions of the title insurance commitment are satisfied.

A. DAILY PROCEDURES

1. A title insurance commitment must be prepared and delivered to all proposed insured parties before settlement is conducted and any title insurance policy is delivered to them. When the Company is conducting settlement in connection with the transaction, the commitment is delivered at least five (5) business days prior to settlement.

2. All title insurance commitments are prepared after a careful examination of the title and determination of insurability in strict accordance with the Company's underwriter guidelines by one of the Company's authorized signatories.

3. Settlement may be scheduled and conducted once the Company is satisfied that all commitment requirements have been met or will be met at settlement.

4. After settlement is conducted, the file is reviewed by the Escrow Officer immediately after disbursement of the settlement funds.

5. The commitment is marked-up by the Escrow Officer to identify which requirements and exceptions on Schedules B-I and B-II have been satisfied and which ones will remain on the final policies as exceptions.

6. If additional documentation is needed for any of the commitment requirements, the file processor works to obtain same.

7. Once all of the requirements on Schedule B-I have been marked-up as being satisfied, the Escrow Officer reviews the title insurance policy section of the loan closing instructions; generates the necessary policy jackets via the underwriter's online system and prepares the policy schedules and endorsements in accordance with the loan closing instructions.

8. After the policies are prepared, the General Counsel signs the policy or gives the entire file to an authorized policy signatory. Within five (5) days of receiving the file, the authorized signatory reviews the file along with the prepared policies. If there are any issues detected by the authorized signatory, they will meet with the Escrow Officer to resolve them.

9. Once the authorized signatory is satisfied that the file is complete and all of the title insurance commitment conditions and requirements have been met, the policies and endorsements are signed, and the file is then returned to the Escrow Officer. Electronic copies of all policies and endorsements are transmitted to the underwriter upon issuance of each policy.

10. The Escrow Assistant types cover letters to be sent to the insured parties with the original policies and original, recorded insured instruments (Deeds and/or Mortgages).

11. Electronic copies of all policies and endorsements are kept in a secure, encrypted file at Paramount Title.

12. The original, recorded Deed and Owner's Policy, if any, are mailed to the purchaser.

13. The original, recorded Mortgage and Loan Policy are overnighted to the address provided in the loan closing instructions. The tracking number of the overnight package is maintained in the file.

B. MONTHLY PROCEDURE

The General Counsel monitors policy issuance via reports from the Company's settlement software and its underwriter to ensure compliance with these procedures.

II. PREMIUM REMITTANCE AND POLICY REPORTING PROCEDURES

Paramount Title, LLC ("the Company") shall report all title insurance premiums and policies to the underwriter(s) within the time frame required by the underwriter agency contract(s) and within the time frame required by any state statute or regulation.

A. DAILY PROCEDURES

1. Whenever a settlement is conducted in connection with a title insurance commitment issued by the Company, funds due to the title insurance underwriter for their portion of the policy premium, endorsement premium(s), if any, and Closing Protection Letter fee, if any, is placed in a segregated escrow account for that underwriter until such payment is disbursed to the underwriter.

2. Details relating to each policy issued is maintained in the Company's settlement software which also generates a Monthly Premium Report ("MPR") for each underwriter and ensures that the check amount matches the calculation by the underwriter's system.

B. MONTHLY PROCEDURES

1. During the first week of each month, the Company General Counsel prints a report of all title insurance settlements conducted the previous month along with the underwriter monthly premium report for that month. The Company General Counsel compares the two reports to each other to make sure there are no discrepancies.

2. Having confirmed all of the title insurance files from the previous month are included on the underwriter's Monthly Premium Report and all sums deposited in the underwriter(s) escrow accounts are correct amounts, the General Counsel pays the underwriter premiums using either (i) electronic bill payment through Wells Fargo to the underwriter or (ii) direct electronic payment to the underwriter through the underwriter's payment portal.

3. If the underwriter contacts the Company with any questions or additional documentation requests, the Company General Counsel addresses same within twenty-four (24) hours.

C. QUARTERLY PROCEDURES

The Company General Counsel reviews a Policy Status Report and a Premium Variance Report from the underwriter to make see if there are discrepancies that need to be reconciled. Files shown as not reported yet are researched to determine if they are canceled or still pending. Any file determined to have been canceled is then reported as such to the underwriter. Any discrepancies shown on the premium variance report are researched and rectified, if necessary.

BEST PRACTICE NUMBER SIX
ERRORS AND OMISSIONS, FIDELITY, AND CYBER LIABILITY COVERAGE

Definition: Maintain appropriate levels of professional liability, fidelity, and cyber liability coverage to ensure the financial capacity to stand behind the professional services provided.

Purpose: Appropriate levels of professional liability insurance or errors and omissions insurance, cyber liability, and crime coverage (fidelity coverage) help ensure title agencies and settlement companies maintain the financial capacity to stand behind their professional services. In addition, state law and title insurance underwriting agreements may require a company to maintain professional liability insurance or errors and omissions insurance, fidelity coverage or surety bonds. Cyber liability insurance and crime coverage is highly recommended as additional protection.

Paramount Title, LLC consistently maintains all levels of insurance as required by underwriters and lenders and that is comparable to the complexity, nature, and scope of our operations. Coverage is held for professional liability, fidelity, and cyber liability coverage (including employee theft) as well as any additional bond coverage that may be required by the state of New Mexico. Copies of current insurance certificates showing policy coverages and amounts are available in Appendix C.

I. E & O INSURANCE

Paramount Title has a current Professional Liability/Errors & Omissions Policy insured through Lloyd's of London with an effective date of 01/21/2020 and an expiration date of 01/21/2021. The policy limits are \$ 1,000,000 each claim and \$1,000,000 aggregate. The deductible amount is \$5,000. The policy specifically includes Title Insurance Agent, Escrow Agent, Closing Agent, Notary Public, Title Abstractor and Title Searcher in the definition of "Professional Services."

A. ANNUAL RENEWAL PROCEDURES

1. The Company General Counsel maintains a complete copy of the policy in a secure file in their office. Sixty (60) days prior to the expiration date of the policy, the Company General Counsel reviews the applicable state regulations and underwriter agency agreement(s) to determine if any requirements have changed.

2. The Company General Counsel reviews the definition of "professional services" in the policy to determine if the policy provides adequate coverage for the Company's current scope of operations. Any additional coverage deemed necessary is requested at the time of renewal.

II. FIDELITY BOND

Paramount Title, LLC maintains a Fidelity Bond to provide coverage for employee dishonesty/crime in compliance with any state regulations and underwriter agency

agreements. Paramount Title's Fidelity Bond through Lloyd's of London in the amount of \$250,000 with an effective date of 01/21/2020 and an expiration date of 01/21/2021. The deductible amount is \$5,000.

A. ANNUAL RENEWAL PROCEDURES

1. The Company General Counsel maintains a complete copy of the Fidelity Bond in a secure file in their office. Sixty (60) days prior to the expiration date of each Bond, the Company General Counsel reviews the applicable state regulations and underwriter agency agreements to determine if any requirements have changed.

2. After reviewing the applicable state regulations, underwriter agency agreements and existing Bonds, the Company General Counsel completes renewal applications at least thirty (30) days prior to the expiration of the current Bonds.

II. CYBER LIABILITY INSURANCE

Paramount Title, LLC maintains two separate policies of Cyber Liability Insurance to provide coverage for data breaches and data theft in compliance with any state regulations and underwriter agency agreements. One of Paramount Title's Cyber Liability Insurance policies is through Lloyd's of London in the amount of \$250,000 with an effective date of 01/21/2020 and an expiration date of 01/21/2021. The deductible amount on Cyber Liability policy from Lloyd's policy is \$1,000. Paramount Title's second Cyber Liability Insurance policy is through The Hartford in the amount of \$250,000 with an effective date of 01/08/2020 and an expiration date of 01/08/2021. The deductible amount on Cyber Liability policy from The Hartford policy is \$5,000.

A. ANNUAL RENEWAL PROCEDURES

1. The Company General Counsel maintains a complete copy of the Cyber Liability policies in a secure file in their office. Sixty (60) days prior to the expiration date of each Cyber Liability policy, the Company General Counsel reviews the applicable state regulations and underwriter agency agreements to determine if any requirements have changed.

2. After reviewing the applicable state regulations, underwriter agency agreements and existing policies, the Company General Counsel completes renewal applications at least thirty (30) days prior to the expiration of the current Cyber Liability policies.

BEST PRACTICE NUMBER SEVEN CONSUMER COMPLAINTS

Definition: Adopt and maintain procedures for receiving and addressing consumer complaints so that any instances of poor service or non-compliance do not go undiscovered.

Purpose: A process for receiving and addressing consumer complaints helps ensure reported instances of poor service or non-compliance do not go undiscovered.

Paramount Title, LLC Policies and Procedures: Paramount Title, LLC is sensitive to any complaints and has developed several ways for complaints to be registered and resolved.

- Any and all complaints received by an employee directly from the complainant are forwarded to our Company General Counsel for immediate resolution. This resolution will always include a follow up to not only the customer but also any other parties to the transaction referenced in the complaint to ensure that the issue has been resolved.
- Paramount Title has email addresses on its website which allows clients or members of the public to register complaints directly to Paramount Title's management via email.
- Paramount Title is a member of the Better Business Bureau ("BBB") and holds an A- Business Rating as of the date of this policy. Paramount Title has installed a "BBB" button on its website which allows clients or members of the public to register complaints directly with the BBB; such complaints are then relayed to Paramount Title's management via email and the BBB acts as an independent third-party intermediary to facilitate a response and resolution to the complaint. Paramount Title's BBB rating is subject to satisfactory resolution of complaints registered through BBB.
- Complaints are also accepted via U.S. Mail or telephone.

Each complaint received concerning a particular transaction is logged and placed in the corresponding transactional file. A copy of Paramount Title's Complaint Policy is available in Appendix E.

I. COMPLAINT INTAKE, RECORDATION AND RESPONSE PROCEDURES

Paramount Title, LLC ("the Company") is dedicated to providing excellent client satisfaction and customer service. In an effort to ensure that complaints are addressed as efficiently and effectively as possible, the Company has a written Consumer Complaint Policy and procedures for the intake, recordation and response to client and customer complaints. All employees must follow these procedures to ensure an effective and consistent approach to dealing with complaints. The policy is made available to customers at settlement.

The written Consumer Complaint Policy is reviewed annually by all employees.

The definition of the term complaint is defined under the Complaint Resolution Policy as an expression of dissatisfaction or concern expressed by a client or customer regarding the services, operating procedures, staff, vendors, or complaint handling process.

1. Each complaint received is directed to the Company General Counsel who completes a Complaint Intake Form that includes:

- Date of complaint;
- Contact information of the consumer or person making the complaint;
- File number, file name and/or policy number;
- Brief description of the complaint;
- Brief description of the resolution requested;
- Amount of fees associated with the transaction (if complaint is related to fees);
- Employee assigned to the matter concerned;
- Summary of efforts to resolve the complaint; and
- Description of result of resolution efforts.

2. The Company General Counsel also logs all complaints on the Company's Consumer Complaint Log which is used to identify open complaints.

3. The Company General Counsel assigns an employee to investigate and resolve each complaint within twenty-four (24) hours of receipt.

4. The designated employee is provided with a copy of the Complaint Intake Form.

5. The designated employee locates the relevant file(s); reviews the relevant documentation; determines a proper resolution and carries out the action(s) necessary to resolve the complaint.

6. In the event that the employee is unable to resolve the complaint to the customer's satisfaction, the Company General Counsel will review the matter and re-assign it or assume the responsibility.

7. Upon resolution of the complaint (or inability to resolve), the employee completes the Summary of Resolution section of the Intake Form and returns it along with the supporting documentation, if any, to the Company General Counsel.

8. Complaint records are retained for a period of five (5) years.

II. COMPLAINT RECORDS PROCEDURES

In an effort to ensure that complaints are addressed as efficiently and effectively as possible, the Company records all complaints. Lenders will be permitted to see complaint

records related to their loans.

III. ANALYSIS AND SELF-ASSESSMENT PROCEDURES

The Company reviews and analyzes the handling of complaints so adjustments to operations and procedures can be made as warranted. The Company General Counsel reviews and analyzes the Company's handling of consumer complaints in accordance with the Company's written consumer complaint policy on a semi-annual basis. The purpose of the semi-annual review is to identify trends and types of risks (i.e. legal, regulatory, reputation, financial, etc.) to determine if any changes need to be made to the Company's policies and procedures.

IV. CONSUMER COMPLAINT TRAINING PROCEDURES

All employees receive annual training on the Company's Consumer Complaint Policy. New employees are given a copy of all of the Company's policies and procedures, including a copy of the Company's Complaint Resolution Policy. An acknowledgment of receipt and comprehension of these procedures will be executed by the employee and maintained by the Company General Counsel.

APPENDIX A

Title Insurance Producer Licenses

Appointments NM OSI Form 202B

NAIC Information Sheets

PARAMOUNT TITLE, LLC
518 OLD SANTA FE TRAIL
STE. 1, NO. 168
SANTA FE NM 87505

License No: 3000749321

State of New Mexico

NPN:

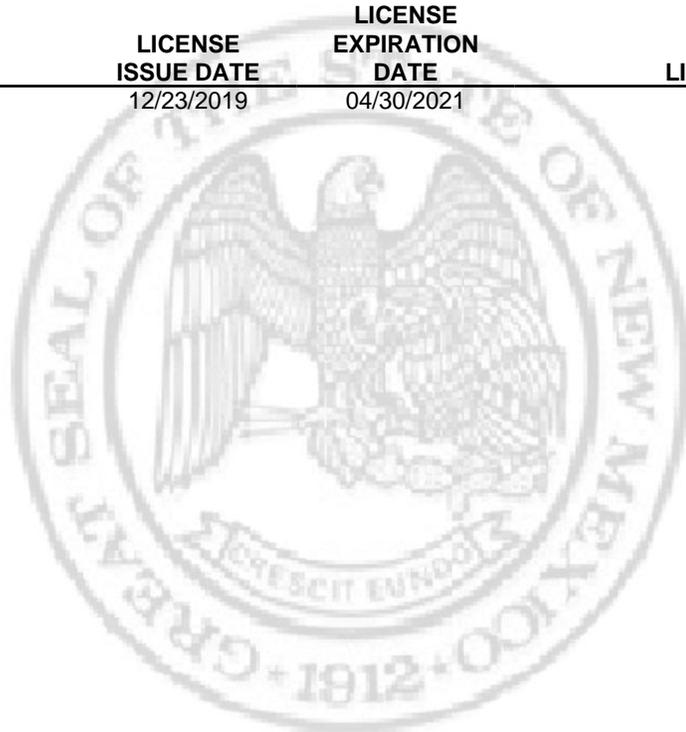
OFFICE OF THE SUPERINTENDENT OF INSURANCE

PARAMOUNT TITLE, LLC

2100 CALLE DE LA VUELTA
SUITE E104
SANTA FE NM 87505

This is to certify that pursuant to requirements of the Insurance Code of New Mexico the above named is qualified to do business in New Mexico with the authority listed below.

LICENSE/REGISTRATION	LICENSE ISSUE DATE	LICENSE EXPIRATION DATE	LINE OF AUTHORITY
Insurance Producer	12/23/2019	04/30/2021	Title



This qualification shall remain in effect until the expiration date, when applicable, unless previously suspended, revoked or terminated pursuant to the law and regulations in force.

John G. Franchini
Superintendent of Insurance

to validate the accuracy of this license you may review the same at
<https://sbs.naic.org/solar-external-lookup/>

License No: 8723018 State of New Mexico NPN: 8723018

OFFICE OF THE SUPERINTENDENT OF INSURANCE

James A. Gomez
1910 AVENIDA CANADA
NM
ESPANOLA NM 87532

This is to certify that pursuant to requirements of the Insurance Code of New Mexico the above named is qualified to do business in New Mexico with the authority listed below.

LICENSE/REGISTRATION	LICENSE ISSUE DATE	LICENSE EXPIRATION DATE	LINE OF AUTHORITY
Insurance Producer	12/19/2019	03/31/2021	Title

This qualification shall remain in effect until the expiration date, when applicable, unless previously suspended, revoked or terminated pursuant to the law and regulations in force.

to validate the accuracy of this license you may review the same at <https://sbs.naic.org/solar-external-lookup/>

John G. Franchini
John G. Franchini
Superintendent of Insurance

James A. Gomez
1910 AVENIDA CANADA
NM
ESPANOLA NM 87532

License No: 8723018

State of New Mexico

NPN: 8723018

OFFICE OF THE SUPERINTENDENT OF INSURANCE

James A. Gomez

1910 AVENIDA CANADA
NM
ESPANOLA NM 87532

This is to certify that pursuant to requirements of the Insurance Code of New Mexico the above named is qualified to do business in New Mexico with the authority listed below.

LICENSE/REGISTRATION	LICENSE ISSUE DATE	LICENSE EXPIRATION DATE	LINE OF AUTHORITY
Insurance Producer	12/19/2019	03/31/2021	Title

This qualification shall remain in effect until the expiration date, when applicable, unless previously suspended, revoked or terminated pursuant to the law and regulations in force.

to validate the accuracy of this license you may review the same at <https://sbs.naic.org/solar-external-lookup/>

John G. Franchini
John G. Franchini
Superintendent of Insurance

License No: 19365715

State of New Mexico

NPN: 19365715

OFFICE OF THE SUPERINTENDENT OF INSURANCE

THOMAS W BANNER

518 OLD SANTA FE TRAIL

SUITE 1, NO. 168

SANTA FE NM 87505

This is to certify that pursuant to requirements of the Insurance Code of New Mexico the above named is qualified to do business in New Mexico with the authority listed below.

<u>LICENSE/REGISTRATION</u>	<u>LICENSE ISSUE DATE</u>	<u>LICENSE EXPIRATION DATE</u>	<u>LINE OF AUTHORITY</u>
Insurance Producer	12/11/2019	05/31/2021	Title

This qualification shall remain in effect until the expiration date, when applicable, unless previously suspended, revoked or terminated pursuant to the law and regulations in force.

John G. Franchini
Superintendent of Insurance

to validate the accuracy of this license you may review the same at
<https://sbs.naic.org/solar-external-lookup/>

THOMAS W BANNER

518 OLD SANTA FE TRAIL

SUITE 1, NO. 168

SANTA FE NM 87505

License No: 19365715

State of New Mexico

NPN: 19365715

OFFICE OF THE SUPERINTENDENT OF INSURANCE

THOMAS W BANNER

518 OLD SANTA FE TRAIL

SUITE 1, NO. 168

SANTA FE NM 87505

This is to certify that pursuant to requirements of the Insurance Code of New Mexico the above named is qualified to do business in New Mexico with the authority listed below.

<u>LICENSE/REGISTRATION</u>	<u>LICENSE ISSUE DATE</u>	<u>LICENSE EXPIRATION DATE</u>	<u>LINE OF AUTHORITY</u>
Insurance Producer	12/11/2019	05/31/2021	Title

This qualification shall remain in effect until the expiration date, when applicable, unless previously suspended, revoked or terminated pursuant to the law and regulations in force.

John G. Franchini
Superintendent of Insurance

to validate the accuracy of this license you may review the same at
<https://sbs.naic.org/solar-external-lookup/>

**STATE OF NEW MEXICO – OFFICE OF SUPERINTENDENT OF INSURANCE (OSI)
PRODUCER LICENSING BUREAU**

Business Entity Affiliation Form

Business Entity Federal Id Number 84-3347990 License Number 3000749321
 Business Entity Name Paramount Title, LLC
 Address 2100 Calle de la Vuelta, Suite E104 City Santa Fe State Zip 87505
 Contact Person Thomas W. Banner Telephone No. 505-772-0303
 Email Address tom@ParamountTitleNM.com

Notice is hereby given that effective from the date shown on this notice, the designated business entity hereby affiliates the licensee(s) named herein to act as its affiliate.

Affiliation fee is \$20.00 per affiliate. Make checks payable to OSI.

Customers making payments to the Office of Superintendent of Insurance (OSI): When you provide a check as payment, you authorize the State of New Mexico to either use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

NAME AS SHOWN ON LICENSE	LICENSE NUMBER / NPN
JAMES A GOMEZ	8723018

Please only have 6 affiliations per form and one check per form

Total affiliations One (1) \$20.00 per affiliate = \$ 20.00

Signature must be that of an officer of the business entity or a person authorized by the business entity to sign on behalf of the business entity.

Printed Name Thomas W. Banner Official Title Member
 Signature _____ Date 1/27/2020

Mailing address: PO Box 1689, Santa Fe, New Mexico 87504
 Overnight address: 1120 Paseo de Peralta, Room 331, Santa Fe, New Mexico 87501
 Telephone number: (505) 827-4349

All filing fees are non-refundable or non-transferable, whether or not the application is processed. NMSA 59A-6-1. All fees are earned when paid and are not refundable.

**STATE OF NEW MEXICO – OFFICE OF SUPERINTENDENT OF INSURANCE (OSI)
PRODUCER LICENSING BUREAU**

Business Entity Affiliation Form

Business Entity Federal Id Number 84-3347990 License Number 3000749321
 Business Entity Name Paramount Title, LLC
 Address 2100 Calle de la Vuelta, Suite E104 City Santa Fe State Zip 87505
 Contact Person Thomas W. Banner Telephone No. 505-417-7397
 Email Address tom@ParamountTitleNM.com

Notice is hereby given that effective from the date shown on this notice, the designated business entity hereby affiliates the licensee(s) named herein to act as its affiliate.

Affiliation fee is \$20.00 per affiliate. Make checks payable to OSI.

Customers making payments to the Office of Superintendent of Insurance (OSI): When you provide a check as payment, you authorize the State of New Mexico to either use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

NAME AS SHOWN ON LICENSE	LICENSE NUMBER / NPN
Thomas W. Banner	19365715

Please only have 6 affiliations per form and one check per form

Total affiliations One (1) \$20.00 per affiliate = \$ 20.00

Signature must be that of an officer of the business entity or a person authorized by the business entity to sign on behalf of the business entity.

Printed Name Thomas W. Banner Official Title Member
 Signature _____ Date 12/23/2019

Mailing address: PO Box 1689, Santa Fe, New Mexico 87504
 Overnight address: 1120 Paseo de Peralta, Room 331, Santa Fe, New Mexico 87501
 Telephone number: (505) 827-4349

All filing fees are non-refundable or non-transferable, whether or not the application is processed. NMSA 59A-6-1. All fees are earned when paid and are not refundable.

Jurisdiction: New Mexico

Licensee Demographics

Name: Gomez, James A. **NPN:** 8723018
Domicile State: New Mexico **Domicile Country:** United States **Resident?:** Yes
Business Address:
 SANTA FE, NM 87505-4819

License Quick View

License Class	License Status	Status Date	Effective Date	Expiration Date
Insurance Producer	Active	12/19/2019	12/19/2019	03/31/2021

Phone, Email, Website

Phone		Email		Website
Type	Number	Type	E-mail	No results found.
Business Primary Phone	(505) 927-8844	Business Email	james@paramounttitenm.com	

License Information

License Type: Insurance Producer
License Number: 8723018 **License Status:** Active
First Active Date: 02/02/2006 **Effective Date:** 12/19/2019
Legacy License ID: 159142 **Status Date:** 12/19/2019
Expiration Date: 03/31/2021

Line Of Authority

Line Name	Qualification	School Code	Exam/Cert Date	Line Status	Status Date	Effective Date
Title	Exam		12/19/2019	Approved	12/19/2019	12/19/2019

Designated Responsible Licensed Producer

No results found.

Relationships

No results found.

Business Entity Affiliations



FEIN	Name	Related License #	Related License Type	Effective Date
84-3347990	PARAMOUNT TITLE, LLC	3000749321	Insurance Producer	01/27/2020

Continuing Education Information

CE Compliant: No **Compliance Date:**
CE Start Date: 12/19/2019 **CE End Date:** 03/31/2021
Design/Over 25 years: No **CE Exemption Type:** Not Exempt **CE Exemption Reason:**
General Target: 7 **General Credits:** 0
Ethics Target: 0 **Ethics Credits:** 0
Escrow Target: 3 **Escrow Credits:** 0

Appointments



Company Name	FEIN	NAIC CoCode	License Type	Line of Authority	Appointment Date	Effective Date	Expiration Date
First American Title Insurance Company	95-2566122	50814	Insurance Producer	Title	01/03/2020	01/03/2020	04/30/2021
Fidelity National Title Insurance Company	86-0417131	51586	Insurance Producer	Title	12/20/2019	03/19/2020	04/30/2021
Commonwealth Land Title Insurance Company	23-1253755	50083	Insurance Producer	Title	12/20/2019	03/19/2020	04/30/2021
Stewart Title Guaranty Company	74-0924290	50121	Insurance Producer	Title	02/28/2020	02/28/2020	04/30/2021

Jurisdiction: New Mexico

Licensee Demographics

Name: BANNER, THOMAS W **NPN:** 19365715
Domicile State: New Mexico **Domicile Country:** United States **Resident?:** Yes
Business Address:
SANTA FE, NM 87505-4819

License Quick View

License Class	License Status	Status Date	Effective Date	Expiration Date
Insurance Producer	Active	12/11/2019	12/11/2019	05/31/2021

Phone, Email, Website

Phone		Email		Website
Type	Number	Type	E-mail	No results found.
Business Primary Phone	(505) 772-0303	Business Email	tom@paramounttitlenm.com	

License Information

License Type: Insurance Producer
License Number: 19365715 **License Status:** Active
First Active Date: 12/11/2019 **Effective Date:** 12/11/2019 **Status Date:** 12/11/2019
Legacy License ID: **Expiration Date:** 05/31/2021

Line Of Authority

Line Name	Qualification	School Code	Exam/Cert Date	Line Status	Status Date	Effective Date
Title	Exam		12/11/2019	Approved	12/11/2019	12/11/2019

Designated Responsible Licensed Producer

Name	License #	NPN	License Class	License Status	Resident State	Start Date
PARAMOUNT TITLE, LLC	3000749321	19375635	Insurance Producer	Active	New Mexico	12/23/2019

Relationships

No results found.

Business Entity Affiliations

FEIN	Name	Related License #	Related License Type	Effective Date
84-3347990	PARAMOUNT TITLE, LLC	3000749321	Insurance Producer	12/26/2019

Continuing Education Information

CE Compliant: No **Compliance Date:**
CE Start Date: 12/11/2019 **CE End Date:** 05/31/2021
Design/Over 25 years: No **CE Exemption Type:** Not Exempt **CE Exemption Reason:**
General Target: 7 **General Credits:** 0
Ethics Target: 0 **Ethics Credits:** 0
Escrow Target: 3 **Escrow Credits:** 0

Appointments

Company Name	FEIN	NAIC CoCode	License Type	Line of Authority	Appointment Date	Effective Date	Expiration Date
Stewart Title Guaranty Company	74-0924290	50121	Insurance Producer	Title	02/28/2020	02/28/2020	04/30/2021
Commonwealth Land Title Insurance Company	23-1253755	50083	Insurance Producer	Title	02/17/2020	02/17/2020	04/30/2021
Fidelity National Title Insurance Company	86-0417131	51586	Insurance Producer	Title	02/17/2020	02/17/2020	04/30/2021

APPENDIX B

Notary Commissions



NOTARY LICENSE LOG

Name	State	Commission #	Commission Effective Date	Commission Expiration Date
Thomas W. Banner	NM	1094797	4/9/2018	9/4/2022
James A. Gomez	NM	1093905	12/10/2019	12/10/2023
Hillary Welles	NM	1079287	1/29/2020	1/2/2024

The Governor
of  the

State of New Mexico

Hereby Appoints

HILLARY WELLES

NOTARY PUBLIC
of The State of New Mexico

*to Discharge the Duties of Said Office
for a Term of Four Years*

Commencing 30TH DAY OF JANUARY, 2020

Expiring 29TH DAY OF JANUARY, 2024

Michelle Lujan Grisham
GOVERNOR

ATTEST:

Maggie Antonia Olin
SECRETARY OF STATE



DONE This 29th Day of January, 2020

Commission #: 1079287

The Governor
of  the

State of New Mexico

Hereby Appoints

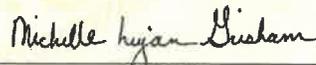
JAMES A. GOMEZ

NOTARY PUBLIC
of The State of New Mexico

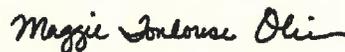
*to Discharge the Duties of Said Office
for a Term of Four Years*

Commencing 11TH DAY OF DECEMBER, 2019

Expiring 10TH DAY OF DECEMBER, 2023


GOVERNOR

ATTEST:


SECRETARY OF STATE



DONE This 10th Day of December, 2019

Commission #: 1093905

The Governor
of  the

State of New Mexico

Hereby Appoints

THOMAS WILLIAM BANNER

NOTARY PUBLIC
of The State of New Mexico

to Discharge the Duties of Said Office
for a Term of Four Years

Commencing 10TH DAY OF APRIL, 2018

Expiring 09TH DAY OF APRIL, 2022




GOVERNOR

ATTEST:



SECRETARY OF STATE

DONE This 09th Day of April, 2018

Commission #: 1094797

APPENDIX C

Certificates of Insurance



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
01/09/2020

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

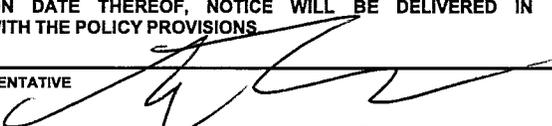
PRODUCER RIO GRANDE INSURANCE SERVICES OF SANTA FE, INC 1231 S. ST. FRANCIS DR, STE A SANTA FE, NM 87505 www.riograndeins.com	CONTACT NAME: SAM LEVY, AGENT	
	PHONE (A/C, No, Ext): (505) 984-8216 FAX (A/C, No): (505) 984-8238 E-MAIL ADDRESS: sam@riograndeins.com	
INSURED PARAMOUNT TITLE LLC 2100 CALLE DE LA VUELTA, UNIT E104 SANTA FE, NM 87505-4819	INSURER(S) AFFORDING COVERAGE	NAIC #
	INSURER A: Hartford Underwriters Insurance Company	
	INSURER B:	
	INSURER C:	
	INSURER D:	
	INSURER E:	

COVERAGES CERTIFICATE NUMBER: REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:			34SBAAE9M2M	01/08/2020	01/08/2021	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
	<input type="checkbox"/> UMBRELLA LIAB <input type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	N/A				PER STATUTE OTH-ER E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
CERTIFICATE HOLDER IS LISTED AS AN ADDITIONAL INSURED, BUT ONLY AS REGARDS THE NEGLIGENCE OF THE NAMED INSURED, BY SCHEDULED ENDORSEMENT.

CERTIFICATE HOLDER W D P INVESTMENTS LLC 2100 CALLE DE LA VUELTA UNIT E101 SANTA FE, NM 87505-4819	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS
	AUTHORIZED REPRESENTATIVE  Sam Levy, agent, sam@riograndeins.com

© 1988-2015 ACORD CORPORATION. All rights reserved.

APPENDIX D

Disaster Recovery Plan

DISASTER RECOVERY PLAN

PURPOSE

This Disaster Recovery Plan (“DRP”) details the policies and procedures of Paramount Title, LLC (the “Company”) in the event of a man-made or naturally occurring emergency or disaster that causes a disruption to critical IT services or any other event or data affecting the business operations of the company. The Plan’s purpose is to ensure the orderly continuation of the Company’s business, including the ability to service the needs of our customers with minimal disruption and delay. Our mission is to ensure data integrity and availability, employee safety, and business continuity.

EMERGENCY RESPONSE TEAM

1. Emergency Response Coordinator

The Emergency Response Team Coordinator is responsible for approving the Plan and updates to the Plan. In the event of an emergency, he has the sole authority to invoke and execute the plan. The following party is the designated Emergency Response Team Plan Coordinator:

Thomas W. Banner
655 Galisteo Street, Apt. 9
Santa Fe, NM 87505
Mobile: 505-417-7397
twbanner@gmail.com
tom@paramounttitenm.com

In the event Mr. Banner is not available or is unable to respond to an emergency for any reason, the following party shall act in his place:

James Gomez
1910 Avenida Canada
Española, NM 87532
Mobile: 505-927-8844
jaimejamesgomez@yahoo.com
james@paramounttitenm.com

2. Administrative Manager

The Administrative Manager will assist Emergency Response Coordinator(s) to implement Emergency Response Procedures. The following party is designated Administrative Manager:

Hillary Welles
655 Galisteo Street, Apt. 9
Santa Fe, NM 87505

Mobile: 505-470-6189
welleshillary@gmail.com
hillary@paramounttitenm.com

3. Information Technology (“IT”) Coordinator

Due to the Company’s reliance on technology to efficiently operate its business, the following party has been assigned responsibility for assuring the redundancy of the Company’s computer and telephone communications systems to prevent the loss of data and provide for the restart of the Company’s electronic communications capabilities within the time frames specified herein:

Stephen S. Resnick
Capitol Computer & Network Solutions
518 Old Santa Fe Trail #6
Santa Fe, NM 87505
Office: 505-216-1108
steve@ccandns.com
www.ccandns.com

The IT Coordinator will work directly with the Emergency Response Team Coordinator to plan the resumption of business services.

EMERGENCY RESPONSE PROCEDURES

1. Emergency Declaration

An emergency may be declared by the Emergency Response Coordinator. An emergency may be declared if a State of Emergency order has been issued by state or federal government; if the country is under terrorist attack or a declaration of war has been issued; in the event of a natural or man-made disaster or imminent emergency situation; a pandemic or other declared public health emergency; or in any circumstance deemed to be detrimental to the safety and welfare of the employees and continuation of business operations.

2. Critical Processes

Upon identification of an emergency, the following procedures will be initiated:

- Emergency Response Team Coordinator will be notified if not on premises.
- Emergency Response Team Coordinator will notify IT Coordinator, or vice versa, depending upon who identifies the disaster.
- All employees and vendors will be contacted to advise them of the situation via telephone or email communications.
- All necessary measures will be taken to preserve company data.
- Employees will be sent home to work remotely as long as is deemed necessary.

- Business operations will resume as soon as possible from safe, remote locations. Closing transactions, title searches, funding transactions, and policy issuance will continue in order of priority as soon as possible.
- Every effort will be made to preserve computer and office hardware.

DATA PRESERVATION PLAN

- Paper files are kept only while cases are active and are scanned and shredded once a case is closed. While onsite, paper files are locked in fire-resistant file cabinets overnight. In the event of an emergency that justifies removal of the files, they will be taken off-site by Company staff and placed in a secure remote location.
- Company data is saved to Amazon Cloud Services and to the Company's onsite Network-Attached Storage ("NAS"). Closed transaction files, or documents pertaining to those files, are retained in electronic format for a period of not less than fifteen (15) years. Scanned files are stored in the Qualia platform, in Amazon Cloud Services, and on the NAS (with redundant, encrypted backup). In the event of destruction of the NAS, all information will be available on Amazon Cloud Services and may be obtained from the IT Coordinator.
- Capitol Computer & Network Solutions monitors backups regularly to ensure security of documents and system integrity.
- If computer hardware is destroyed or deemed unusable, data will still be preserved in Qualia and on the cloud backup.

APPENDIX E

Complaint Policy

COMPLAINT POLICY

Paramount Title is committed to providing excellent customer service. We value the opportunity to learn of any concerns you may have about your experience with Paramount Title, and we appreciate you letting us know if you are dissatisfied with:

- A closing, escrow, or other settlement service provided by Paramount Title;
- A title insurance product which Paramount Title delivered to you; or
- Any other aspect of your experience with Paramount Title.

There are several ways to let us know of a complaint:

1. Submit your complaint via email to Tom@ParamountTitleNM.com
2. Call Thomas W. Banner at 505-772-0303
3. Submit your complaint to the Better Business Bureau from the BBB emblem on our website (www.ParamountTitleNM.com)
4. Via U.S. Mail to:

Paramount Title, LLC
Attn: Consumer Complaints
2100 Calle de la Vuelta, Suite E104
Santa Fe, New Mexico 87505

Be sure to include your name, contact information, your Title Insurance File or Policy Number, and a description of your concern or complaint.

Paramount Title is committed to fully investigating all complaints or client concerns in a fair and prompt manner. Please be assured we will listen to you and take all appropriate action to resolve your concerns as soon as possible.

Thank you for the opportunity to serve you, to learn from our mistakes when they occur, and for allowing us to attempt to resolve your concerns.

APPENDIX F

Privacy Policy

PARAMOUNT TITLE, LLC PRIVACY NOTICE

Effective: March 1, 2020

Paramount Title, LLC respects and is committed to protecting your privacy. This Privacy Notice explains how we collect, use, and protect personal information, when and to whom we disclose such information, and the choices you have about the use and disclosure of that information.

Collection of Personal Information

Paramount Title may collect the following categories of non-public Personal Information:

- Contact information (e.g., name, address, phone number, email address);
- Demographic information (e.g., date of birth, gender, marital status);
- Identity information (e.g. Social Security Number, driver's license, passport, or other government ID number);
- Financial account information (e.g. loan or bank account information); and
- Other personal information necessary to provide products or services to you.

Paramount Title may collect Personal Information about you from:

- Information we receive from you or others acting on your behalf;
- Information about your transactions with Paramount Title, our affiliates, or others; and
- Information we receive from consumer reporting agencies and/or governmental entities, either directly from these entities or through others.

Collection of Browsing Information

Paramount Title automatically collects the following types of Browsing Information when you access the Paramount Title website - <https://www.ParamountTitleNM.com> - ("Website") from your Internet browser, computer, and/or device:

- Internet Protocol (IP) address and operating system;
- Browser version, language, and type;
- Domain name system requests; and
- Browsing history on the Website, such as date and time of your visit to the Website and visits to the pages within the Website.

Like most websites, our servers automatically log each visitor to the Website and may collect the Browsing Information described above. We use Browsing Information for system administration, troubleshooting, fraud investigation, and to improve our websites. Browsing Information generally does not reveal anything personal about you unless you submit it to us through the Website or our closing platform (Qualia).

Cookies. When you visit the Website, a “cookie” may be sent to your computer. A cookie is a small piece of data that is sent to your Internet browser from a web server and stored on your computer’s hard drive. Information gathered using cookies helps us improve your user experience. For example, a cookie can help the website load properly or can customize the display page based on your browser type and user preferences. You can choose whether or not to accept cookies by changing your Internet browser settings. Be aware that doing so may impair or limit some functionality of the Website.

We may use third-party remarketing services to advertise across the Internet. Remarketing will simply display relevant ads tailored to you based on what parts of our website you have viewed by placing the cookie on your machine. This cookie does not give access to your computer nor does it identify you personally in any way. The cookie is used to simply say “this person visited our site, so show them ads relating to how we can better serve them.” Remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

Web Beacons. We use web beacons to determine when and how many times a page has been viewed. This information is used to improve our websites.

Do Not Track. Currently our Website does not respond to “Do Not Track” features enabled through your browser.

Links to Other Sites. The Website may contain links to unaffiliated third-party websites. Paramount Title is not responsible for the privacy practices or content of those websites. We recommend that you read the privacy policy of every website you visit.

Use of Personal Information

Paramount Title uses Personal Information for three main purposes:

- To provide products and services to you or in connection with a transaction involving you;
- To improve our products and services; and
- To communicate with you about our products and services.

When Your Information May Be Disclosed

We may disclose your Personal Information and Browsing Information in the following circumstances:

- To enable us to detect or prevent criminal activity, fraud, material misrepresentation, or nondisclosure;
- To nonaffiliated service providers who provide or perform services or functions on our behalf and who agree to use the information only to provide such services or functions;
- To law enforcement or authorities in connection with an investigation, or in response to a subpoena or court order; or

- In the good-faith belief that such disclosure is necessary to comply with legal process or applicable laws, or to protect the rights, property, or safety of Paramount Title, its customers, or the public.

We may disclose your information to third parties for whom you have given us authorization or consent to make such disclosure. We do not otherwise share your non-public Personal Information or Browsing Information with nonaffiliated third parties, except as required or permitted by law. We do not share Personal Information to others for the purpose of allowing others to directly market to you. We reserve the right to transfer your Personal Information, Browsing Information, and any other information, in connection with the sale or other disposition of all or part of the Paramount Title business and/or assets, or in the event of bankruptcy, reorganization, insolvency, receivership, or an assignment for the benefit of creditors. By submitting Personal Information and/or Browsing Information to Paramount Title, you expressly agree and consent to the use and/or transfer of the foregoing information in connection with any of the above described proceedings.

Security of Your Information

We maintain physical, electronic, and procedural safeguards to protect your Personal Information. We also restrict access to your Personal Information to those clients, lenders, third parties and employees who need to know that information in order to provide you the settlement services that you have either expressly requested or implicitly requested.

Choices With Your Information

If you do not want Paramount Title to share your information among our affiliates to directly market to you, you may send an “opt out” request by email or physical mail as directed at the end of this Privacy Notice. We do not share your Personal Information with nonaffiliates for their use to direct market to you.

Whether you submit Personal Information or Browsing Information to Paramount Title is entirely up to you. If you decide not to submit Personal Information or Browsing Information, Paramount Title may not be able to provide certain services or products to you.

Information From Children

The Website is not intended or designed to attract persons under the age of eighteen (18). We do not collect Personal Information from any person that we know to be under the age of eighteen (18) without permission from a parent or guardian.

International Users

Paramount Title's principal place of business is located within the United States. If you reside outside the United States and choose to provide Personal Information or Browsing Information to us, please note that we may transfer that information outside of your country of residence. By providing Paramount Title with your Personal Information and/or Browsing Information, you consent to our collection, transfer, and use of such information in accordance with this Privacy Notice.

Your Consent To This Privacy Notice; Notice Changes; Use of Comments or Feedback

By submitting Personal Information and/or Browsing Information to Paramount Title, you consent to the collection and use of the information in accordance with this Privacy Notice. We may change this Privacy Notice at any time. The Privacy Notice's effective date will show the last date changes were made. If you provide information to us following any change of the Privacy Notice, that signifies your assent to and acceptance of the changes to the Privacy Notice. We may use comments or feedback that you submit to us in any manner without notice or compensation to you.

Accessing and Correcting Information; Contact Us

If you have questions, would like to correct your Personal Information, or want to opt-out of information sharing for affiliate marketing, send your requests to info@ParamountTitleNM.com, or by mail to:

Paramount Title, LLC
2100 Calle de la Vuelta
Suite E104
Santa Fe, New Mexico 87505
Attn: General Counsel

APPENDIX G

ALTA Membership Certificate

CERTIFICATE

of

Membership

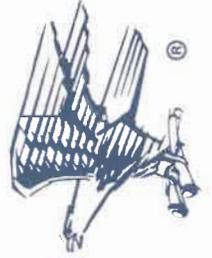
THIS CERTIFIES THAT

Paramount Title

ALTA ID: 1185665

Is a member in good standing of the
American Land Title Association for

2020



Mary O'Donnell

Mary O'Donnell, President

Diane Tomb

Diane Tomb, Chief Executive Officer

APPENDIX H

ALTA Self-Certification

Maturity Model



AMERICAN
LAND TITLE
ASSOCIATION



ALTA BEST PRACTICES MATURITY MODEL

Introduction to the Maturity Model

The Maturity Model is designed to help title insurance and settlement companies determine their compliance with the Best Practices.

The Maturity Model is comprised of seven tables, one for each pillar of the Best Practices. Each table highlights the policies outlined in ALTA's Title Insurance and Settlement Company Best Practices (labeled "Best Practice"). Each table also contains five columns measuring the company's adherence to the Best Practices. These columns have the following labels:

- **Ad Hoc:** company has not yet established any policies or procedures
- **Planning:** company is developing compliance. Procedures and controls exist but are not documents, or procedures and controls are documented by not completely implemented.
- **Defined:** company is partially compliant with the Best Practices. Some procedures and controls exist and are documented, but are not completely being followed.
- **Managed:** company is substantially compliant with the Best Practices. Procedures and controls exist and are documented, but are not being followed consistently.
- **Optimized:** company is fully compliant with the Best Practices. Procedures and controls exist, are documented, and are being followed consistently.

73

Applicable definitions for this Maturity Model:

- **Implemented:** the process/procedure has been established, is documented, and is required by the Company
- **Followed:** the process/procedure has been established, is documented, is required by the Company, and is being performed as intended

The Maturity Model features differentiating characteristics to help companies define where its policies and procedures fit within the Best Practices and the steps it must do to become fully compliant with the Best Practices. This Maturity Model also allows companies to represent progress towards Best Practices compliance.

Instructions

You should use this Maturity Model following an assessment of your company's compliance with the Best Practices using ALTA's Title Insurance and Settlement Company Best Practices and Assessment Procedures. Based on the results of your assessment, identify the benchmark compliance level that best describes your company's policies and procedures for each Best Practice.

Within the Maturity Model Summary, you should mark with an "X" the benchmark compliance level that best describes your company's procedures for each Best Practice. You should also indicate the steps your company is taking to improve its compliance with each Best Practice within the Progress Plan column. Identifying where your company lies on this Maturity Model will help you identify any next steps your company can take to fully comply with the Best Practices. Upon completion of this summary, you will have a high-level report that indicates your company's compliance with the Best Practices.

We hope you will find this Maturity Model a helpful tool as you evaluate your company's policies and procedures and strive to implement practices that will help your company succeed in the industry. Additional resources on ALTA's Best Practices, including ALTA's Maturity Model Explainer, are available on our website at <http://www.alta.org/bestpractices>. Any questions regarding this Maturity Model may be submitted to bestpractices@alta.org.

Maturity Model Summary

ALTA Best Practices	Benchmark Compliance Levels					Progress Plan
	Ad Hoc	Planning	Defined	Managed	Optimized	
Pillar 1						
Establish and maintain current license(s) as required to conduct the business of title insurance and settlement services	<input type="checkbox"/>				<input checked="" type="checkbox"/>	
Establish and maintain appropriate compliance with ALTA's Policy Forms Licensing requirement	<input type="checkbox"/>				<input checked="" type="checkbox"/>	
Pillar 2						
Written procedures and controls exist for escrow trust accounts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Escrow funds and operating accounts are separately maintained	<input type="checkbox"/>		<input type="checkbox"/>		<input checked="" type="checkbox"/>	
Escrow Trust Accounts are prepared with Trial Balances, listing all file/escrow balances	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Escrow Trust Accounts are reconciled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Escrow Trust Accounts are properly identified	<input type="checkbox"/>		<input type="checkbox"/>		<input checked="" type="checkbox"/>	
Outstanding file balances are documented	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Transactions are conducted by authorized employees only	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Escrow Trust Accounts are maintained in Federally Insured Financial Institutions	<input type="checkbox"/>				<input checked="" type="checkbox"/>	
Utilize Positive Pay or Reverse Positive Pay, if available in the marketplace, and have policies and procedures in place that prohibit or control the use of Automated Clearing House and international wires	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Background Checks are completed	<input type="checkbox"/>		<input type="checkbox"/>		<input checked="" type="checkbox"/>	
Ongoing training is conducted for employees involved in the management of escrow funds and escrow accounting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Pillar 3				
Written privacy and information security program exists to protect non-public personal information (NPI) as required by local, state and federal law	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Physical security of Non-public Personal Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Network security of Non-public Personal Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disposal and maintenance of Non-public Personal Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Establish a disaster management plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Appropriate management and training of employees to help ensure compliance with Company's information security program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Oversight of service providers to help ensure compliance with Company's information security program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Audit and oversight procedures to help ensure compliance with a Company's information security program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Notification of security breaches to customers and law enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pillar 4				
Procedures related to recording of documents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procedures related to pricing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procedures related to the settlement process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Procedures related to third-party signing professionals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pillar 5				
Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Title policy production and delivery; premium reporting and remittance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pillar 6				
Maintain appropriate professional liability insurance and fidelity coverage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pillar 7				
Adopt and maintain written procedures for resolving consumer complaints	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ALTA Best Practices Maturity Model

Pillar 1						
Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Establish and maintain current license(s) as required to conduct the business of title insurance and settlement services	1.01, 1.02	Licenses and corporate registrations are not available and active for all states and jurisdictions in which the company operates on the assessment date				Licenses and corporate registrations are available and active for all states and jurisdictions in which the company operates on the assessment date
Establish and maintain appropriate compliance with ALTA's Policy Forms Licensing requirement	1.03	Company does not maintain active ALTA Policy Forms License				Company maintains an active ALTA Policy Forms License

Pillar 2

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Written procedures and controls exist for Escrow Trust Accounts	2.01	Neither written procedures nor controls exist	Procedures and controls exist but are not documented <u>or</u> procedures and controls are documented but are not completely implemented	Some procedures and controls exist and are documented, but are not completely being followed	Procedures and controls exist and are documented, but are not being followed consistently	Procedures and controls exist, are documented, and are being followed consistently
Escrow funds and operating accounts are separately maintained	2.03n	Escrow and fiduciary funds are comingled with operating accounts		Underwriter premiums and/or recording fees are comingled with operating accounts		No escrow or fiduciary funds are comingled with operating accounts
Escrow Trust Accounts are prepared with Trial Balances, listing all open file/escrow balances	2.03e, 2.03h, 2.03l, 2.03m	No escrow accounts or fiduciary accounts are prepared with a Trial Balance	Some escrow accounts and fiduciary accounts are prepared with a Trial Balance	Most Escrow accounts and fiduciary accounts are prepared with a Trial Balance; however, underwriter premium and/or recording account may or may not be prepared with a Trial Balance	All escrow accounts and fiduciary accounts are prepared with a Trial Balance, including recording account, but not underwriter premium account or underwriter account but not the recording account; however, compensating controls are in place	All escrow accounts or fiduciary accounts are prepared with Trial Balances

Pillar 2

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Escrow Trust Accounts are reconciled	2.03a, 2.03b, 2.03c, 2.03d, 2.03e, 2.03i, 2.03o, 2.03p	Escrow and fiduciary accounts are not reconciled	Escrow accounts and fiduciary accounts undergo Three-Way Reconciliations less than monthly	Escrow accounts and fiduciary accounts undergo Three-Way Reconciliations monthly; however, segregation of duties may not exist and/or are insufficient	Escrow accounts and fiduciary accounts undergo Three-Way Reconciliations monthly and segregation of duties are in place; however, reconciliations are not reviewed by management and/or daily reconciliation of receipts and disbursements is not performed	Escrow accounts and fiduciary accounts undergo Three-Way Reconciliations monthly, segregation of duties are in place, reconciliations are reviewed by management, and daily reconciliations of receipts and disbursements are performed
Escrow Trust Accounts are properly identified	2.02, 2.03f, 2.04	Escrow and fiduciary accounts are not properly identified as “escrow” or “trust”		Escrow and fiduciary accounts are properly identified as “escrow” or “trust;” however, not all account-related documentation is consistently identified as such		All escrow trust accounts and fiduciary accounts are properly identified as “escrow” or “trust” and all related documentation is also properly identified
Outstanding file balances are documented	2.03j, 2.03k, 2.03l	No documentation exists for the outstanding file balances for escrow accounts and fiduciary accounts	Some documentation exists for the outstanding file balances for escrow accounts and fiduciary accounts		Most escrow and fiduciary accounts have documentation of outstanding file balances	All escrow accounts or fiduciary accounts are prepared with documented outstanding file balances

Pillar 2

Benchmark Compliance Levels

Related Assessment Procedures		Ad Hoc	Planning	Defined	Managed	Optimized
Transactions are conducted by authorized employees only	2.02, 2.03g	There are no controls in place to prevent unauthorized employees from conducting transactions	There are some controls in place to prevent unauthorized employees from conducting transactions; however, terminated employees are not immediately deleted as listed signatories on all bank accounts		There are controls in place to prevent unauthorized employees from conducting transactions and terminated employees are immediately deleted as listed signatories on all bank accounts; however, appropriate authorization levels are not reviewed annually	All transactions are performed by authorized employees only and authorization levels are annually reviewed with terminated employees immediately deleted as listed signatories on all bank accounts.
Escrow Trust Accounts are maintained in Federally Insured Financial Institutions	2.05	Escrow Trust Accounts are not maintained in Federally Insured Financial Institutions				All Escrow Trust Accounts are maintained in Federally Insured Financial Institutions

Pillar 2

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels			
		Ad Hoc	Planning	Defined	Managed
Utilize Positive Pay or Reverse Positive Pay, if available in the marketplace, and have policies and procedures in place that prohibit or control the use of Automated Clearing House (ACH) and international wires	2.06a, 2.06b	Positive pay, reverse positive pay, ACH controls and/or international wire controls are not used on any accounts	Positive pay, reverse positive pay, ACH controls and/or international wire controls are not used on all accounts	Positive pay, reverse positive pay, ACH controls and international wire controls are used on some accounts	Positive pay, reverse positive pay if available in the local marketplace), and ACH controls and international wire controls are used on all accounts
Background Checks are completed	2.02c	No Background Checks are performed on employees with access to customer funds	Background Checks are performed at hiring, but are not routinely updated for employees with access to customer funds	Background Checks are performed at hiring, but are not routinely updated for employees with access to customer funds	All employees with access to customer funds have undergone Background Checks either at hiring or within the past three years and Background Checks are updated at least every three years

Pillar 2

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Ongoing training is conducted for employees involved in the management of escrow funds and escrow accounting	2.02d	No training is conducted for employees involved in the management of escrow funds and/or escrow accounting	Training is conducted for some employees involved in the management of escrow funds and escrow accounting	Training is conducted for most employees involved in the management of escrow funds and escrow accounting	Training is conducted for all employees involved in the management of escrow funds and escrow accounting but such training is not ongoing	Ongoing training is conducted for all employees involved in the management of escrow funds and escrow accounting

Pillar 3

Benchmark Compliance Levels						
Best Practice	Related Assessment Procedures	Ad Hoc	Planning	Defined	Managed	Optimized
		<p>Written privacy and information security program exists to protect non-public personal information (NPI) as required by local, state and federal law</p>	<p>3.01, 3.03, 3.15, 3.16</p>	<p>No written program exists</p>	<p>Program exists but is not documented <u>or</u> program is documented but not implemented</p>	<p>Written program exists and is implemented but does not cover all necessary aspects to protect NPI</p>

Pillar 3

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Physical security of NPI	3.07a, 3.07b, 3.07d, 3.08, 3.09, 3.11	<p>Company does not meet any of the below criteria:</p> <ul style="list-style-type: none"> Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years Use of removable media is restricted and controlled Procedures are in place to utilize only secured delivery methods are used when transmitting NPI 	<p>Company partially meets one or more of the below criteria:</p> <ul style="list-style-type: none"> Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years Use of removable media is restricted and controlled Procedures are in place to utilize only secured delivery methods are used when transmitting NPI 	<p>Company meets one of the below criteria and partially meets remaining criteria:</p> <ul style="list-style-type: none"> Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years Use of removable media is restricted and controlled Procedures are in place to utilize only secured delivery methods are used when transmitting NPI 	<p>Company meets two of the below criteria and partially meets the third criteria:</p> <ul style="list-style-type: none"> Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years Use of removable media is restricted and controlled Procedures are in place to utilize only secured delivery methods are used when transmitting NPI 	<p>Company meets all three of the below criteria:</p> <ul style="list-style-type: none"> Access to NPI is restricted to authorized employees who have undergone background checks performed upon hiring and every 3 years Use of removable media is restricted and controlled Procedures are in place to utilize only secured delivery methods are used when transmitting NPI

Pillar 3

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Network security of NPI	3.06, 3.07c, 3.07d, 3.07e, 3.09, 3.10, 3.12	<p>Company does not meet any of the below criteria:</p> <ul style="list-style-type: none"> Maintain and secure access to Company information technology Develop guidelines for the appropriate use of Company information technology. Ensure secure collection and transmission of NPI 	<p>Company partially meets one or more of the below criteria:</p> <ul style="list-style-type: none"> Maintain and secure access to Company information technology Develop guidelines for the appropriate use of Company information technology. Ensure secure collection and transmission of NPI 	<p>Company meets one of the below criteria and partially meets the one or more of the remaining:</p> <ul style="list-style-type: none"> Maintain and secure access to Company information technology Develop guidelines for the appropriate use of Company information technology. Ensure secure collection and transmission of NPI 	<p>Company meets two of the below criteria and partially meets the third criteria:</p> <ul style="list-style-type: none"> Maintain and secure access to Company information technology Develop guidelines for the appropriate use of Company information technology. Ensure secure collection and transmission of NPI 	<p>Company meets all three of the below criteria:</p> <ul style="list-style-type: none"> Maintain and secure access to Company information technology Develop guidelines for the appropriate use of Company information technology. Ensure secure collection and transmission of NPI
Disposal and maintenance of NPI	3.17	<p>No policies or procedures in place over record disposal and maintenance</p>	<p>Policies and procedures exist but are not documented or are not implemented</p>	<p>Policies and procedures are documented but are not followed</p>	<p>Policies and procedures have been implemented, but are not consistently followed; third party vendor is actively managed</p>	<p>Policies and procedures are documented, implemented, and followed consistently regarding the Company's disposal of NPI in a manner that protects against unauthorized access to or use of the information</p>

Pillar 3

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Establish a disaster management plan	3.13	A disaster management and business resumption plan does not exist	Some of the disaster management and business resumption procedures exist but are not documented or documented but not implemented	Some portions of the disaster management and business resumption plan exist and are documented, but are not implemented or tested	A disaster management and business resumption plan exist, are documented and implemented, however, they are not routinely tested	A disaster management and business resumption plan exist, are documented, implemented and tested on a routine basis
Appropriate management and training of employees to help ensure compliance with Company's information security program	3.02, 3.05	Training is not conducted for any employees on the Company's information security program	Training has been developed but is not conducted for employees	Training is conducted for some employees on the Company's information security program	Training is conducted for most employees on the Company's information security program	Training is conducted for all employees on the Company's information security program
Oversight of service providers to help ensure compliance with Company's information security program	3.14	No oversight of service providers	Oversight of service providers exists but there is no evidence of compliance with the Company's information security program on an ongoing basis	Oversight of service providers exists and there is some evidence of compliance with the Company's information security program on an ongoing basis	Oversight of service providers exists and adequately demonstrates evidence of compliance with the Company's information security program on a periodic basis	Oversight of service providers exists and adequately demonstrates evidence of compliance with the Company's information security program on an ongoing basis

Pillar 3

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Audit and oversight procedures to help ensure compliance with a Company's information security program	3.04	No audit and oversight procedures exist	Oversight procedures are in development but not formalized	Oversight exists for the Company's information security program but audits are not being conducted	Oversight exists for the Company's information security program but audits are not being conducted on an ongoing basis	Oversight exists and audits ensure the Company's information security program is in compliance on an ongoing basis
Notification of security breaches to customers and required parties	3.10c, 3.15	Company has no monitoring in place to discover a security breach	Company is monitoring for security breaches but has no procedures to notify customers and required parties	Company is monitoring for security breaches and has a procedure for notification but is not following or is not followed timely.		Company is monitoring for security breaches, has notification procedures in place, and is timely notifying all parties of breaches, if occurred

Pillar 4

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Procedures related to recording of documents	4.01, 4.03	Neither written procedures nor controls exist	Some procedures and controls related to: <ul style="list-style-type: none"> submitting or shipping documents for recording as required tracking recordings addressing rejected documents, and verifying recordings were completed and records of the recording are maintained may be incomplete or not fully documented	Procedures and controls related to: <ul style="list-style-type: none"> submitting or shipping documents for recording as required tracking recordings addressing rejected documents, and verifying recordings were completed and records of the recording are maintained exist and are documented, but are not being followed	Procedures and controls exist related to: <ul style="list-style-type: none"> submitting or shipping documents for recording as required tracking recordings addressing rejected documents, and verifying recordings were completed and records of the recording are maintained exist and are documented, but are not being followed consistently	Procedures and controls are followed consistently and effectively related to: <ul style="list-style-type: none"> submitting or shipping documents for recording as required tracking recordings addressing rejected documents, and verifying recordings were completed and records of the recording are maintained
Procedures related to pricing	4.04	Neither written procedures nor controls exist	Some procedures and controls related to: <ul style="list-style-type: none"> rates, discounts, review of charges, and timely refunds exist but may be incomplete or not fully documented	Procedures and controls related to: <ul style="list-style-type: none"> rates, discounts, review of charges, and timely refunds exist and are documented, but are not being followed	Procedures and controls related to: <ul style="list-style-type: none"> rates, discounts, review of charges, and timely refunds exist and are documented, but are not being followed consistently	Procedures and controls are followed consistently and effectively related to: <ul style="list-style-type: none"> rates, discounts, review of charges, and timely refunds

Pillar 4

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels			
		Ad Hoc	Planning	Defined	Managed
Procedures related to the settlement process	4.02	Neither written procedures nor controls exist related to: <ul style="list-style-type: none"> wiring funds, receiving funds, disbursing funds, in accordance with closing instructions and the settlement statement 	Some procedures and controls exist related to: <ul style="list-style-type: none"> wiring funds, receiving funds, disbursing funds, in accordance with closing instructions and the settlement statement but are not documented <u>or</u> procedures and controls are documented but are not implemented 	Procedures and controls exist related to: <ul style="list-style-type: none"> wiring funds, receiving funds, disbursing funds, in accordance with closing instructions and the settlement statement and are documented, but are not being followed consistently 	Procedures and controls are followed consistently and effectively related to: <ul style="list-style-type: none"> wiring funds, receiving funds, disbursing funds, in accordance with closing instructions and the settlement statement, are documented

Pillar 4

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Procedures related to third-party signing professionals	4.05	Neither written procedures nor controls exist	Some procedures and controls related to: <ul style="list-style-type: none"> • Errors and Omissions insurance coverage • Notary surety bond (if required) • Licensure or recognized and verifiable industry designation • Acknowledgement of compliance with Company's instructions and information security program exist but are not documented <u>or</u> procedures and controls are documented but are not implemented 	Procedures and controls related to: <ul style="list-style-type: none"> • Errors and Omissions insurance coverage • Notary surety bond (if required) • Licensure or recognized and verifiable industry designation • Acknowledgement of compliance with Company's instructions and information security program exist and are documented, but are not being followed consistently 	Procedures and controls related to: <ul style="list-style-type: none"> • Errors and Omissions insurance coverage • Notary surety bond (if required) • Licensure or recognized and verifiable industry designation • Acknowledgement of compliance with Company's instructions and information security program exist and are documented, but are not being followed consistently 	Either third-party signing professionals engaged by the Company are directly employed by a Best Practices compliant company <u>or</u> procedures and controls are followed consistently and effectively related to: <ul style="list-style-type: none"> • Errors and Omissions insurance coverage • Notary surety bond (if required) • Licensure or recognized and verifiable industry designation • Acknowledgement of compliance with Company's instructions and information security program

Pillar 5

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance	5.01	Neither written procedures nor controls exist	Procedures and controls exist but are not documented <u>or</u> procedures and controls are documented but are not completely implemented	Some procedures and controls exist and are documented, but are not completely being followed	Procedures and controls exist and are documented, but are not being followed consistently	Procedures and controls exist, and are documented, and are being followed consistently
Title policy production and delivery; premium reporting and remittance	5.02	Company does not meet any of the below criteria: <ul style="list-style-type: none"> • timely title policy production • timely title policy delivery • timely policy reporting • timely premium remittance 	Company meets one of the below criteria and partially meets one or more of the remaining criteria: <ul style="list-style-type: none"> • timely title policy production • timely title policy delivery • timely policy reporting • timely premium remittance 	Company meets two of the below criteria and partially meets one or more of the remaining criteria: <ul style="list-style-type: none"> • timely title policy production • timely title policy delivery • timely policy reporting • timely premium remittance 	Company meets three of the below criteria and partially meets the remaining criteria: <ul style="list-style-type: none"> • timely title policy production • timely title policy delivery • timely policy reporting • timely premium remittance 	Company meets all four of the below criteria: <ul style="list-style-type: none"> • timely title policy production • timely title policy delivery • timely policy reporting • timely premium remittance

Pillar 6

		Benchmark Compliance Levels				
Best Practice	Related Assessment Procedures	Ad Hoc	Planning	Defined	Managed	Optimized
Maintain appropriate professional liability insurance and fidelity coverage	6.01	No coverages exist		Some but not all required coverages exist		Appropriate and/or required professional liability insurance and fidelity coverage are in place

Pillar 7

Benchmark Compliance Levels

Best Practice	Related Assessment Procedures	Benchmark Compliance Levels				
		Ad Hoc	Planning	Defined	Managed	Optimized
Adopt and maintain written procedures for resolving consumer complaints	7.01, 7.02	Neither written controls nor procedures related to tracking and/or resolving consumer complaints exist	Some controls and procedures related to: <ul style="list-style-type: none"> • complaint intake, documentation tracking log, • setting a single point of contact for resolving complaints exist but may be incomplete or not fully documented	Controls and procedures related to: <ul style="list-style-type: none"> • complaint intake, documentation tracking log, • setting a single point of contact for resolving complaints exist and are documented, but are not being followed	Controls and procedures related to: <ul style="list-style-type: none"> • complaint intake, documentation tracking log, • setting a single point of contact for resolving complaints exist, are documented, and are being followed consistently	Controls and procedures related to: <ul style="list-style-type: none"> • complaint intake, documentation tracking log, • setting a single point of contact for resolving complaints exist, are documented, and are being followed consistently