

Privacy Protection Compliance Protocols

Safe-Guarding Non-Public Information

- ✓ As a Signing Service Professional, I agree to keep all information learned in the scope of a real estate transaction, including documents, conversations, journal entries, and email correspondence confidential, and I will not disclose such information except as required by law, by the hiring party or by the lender.
- ✓ I agree to take all reasonable measures to safeguard all confidential information, to ensure the security and confidentiality of all Customer Information, to protect against anticipated threats to the security of Customer Information and to protect against unauthorized access to or use of such Customer Information.
- ✓ Confidential Information includes Non-public information of the signer(s), “trade secrets” of the hiring party, the Title Company and Lender without limitation.
- ✓ As part of my service, I shall be limited to providing basic explanations for the various documents and processes, obtaining signatures and, where required, the notarization of signatures, on various documents by customers, persons or entities required to execute such documents as part of the transaction; under no circumstance, do I interpret the terms of the document or offer advice or commentary.
- ✓ Every question of a substantive nature regarding any of the documents or their relevance to the underlying transaction to a designated representative of the hiring party.

General Actions

- Studied GLBA Training Module: *Information Stewardship & Security Awareness Training* 40 page book regarding compliance
- Required notary commission issued by the CA Secretary of State maintained
- Insurance and bonding maintained
- National Notary Association (NNA) certification of a Notary Signing Agent maintained
- Annual personnel background reporting (screening) completed
- Privacy policy to safeguard non-public personal information (NPI) maintained
- Written procedures for resolving consumer complaints maintained

Physical Access Security

- Records, paper files, completed journals kept in locked file cabinet
- Notary stamp and journal are safely locked up in the house, office AND in car at all times
- Prompt return or shipment of docs via specified shipper
- No drop-box shipments; only use a staffed facility that can give a receipt (unless by preapproved request and release of liability from hiring party)

Personal Information Stewardship

- Journal entries for prior signer covered
- Signers names *not* added onto shipping labels
- Confidentiality disclaimer in email signature block active
- All excess loan document copies or unnecessary paperwork shredded by a cross-cut shredder
- Faxing --- only done thru encryption software

Electronic Data Security

COMPUTER

- PC password protected using strong passwords changed quarterly
- Passwords to my clients' sites changed [annually/ quarterly/monthly?]
- Paid internet security suite, high security settings, firewall protection installed on PC; software updates run routinely
- Encryption software Inbound & outbound as instructed by clients
- DSL web connection; no accessing files on public networks (i.e. Starbucks)
- No computer remote access
- Email doc files "shredded" after 7 days (both emails with docs and downloaded files) using "Virtual Shredder"
- Hard drive auto-defragmented every week

CELL PHONE

- App to allow securely scan and send of ID and/or docs
- Wi-Fi tuned off
- CDL ID photos deleted same day
- Phone is password protected
- Software that remotely erases information in case the phone is lost or stolen

- Text msgs with borrower information is deleted same day.
- NO communication or info forwards to 3rd parties.

If Something Goes Wrong

- Notify hiring party or owner of the documents immediately if there is any suspected a breach, alteration, destruction, loss or any other unauthorized use of NPI
- Cell phone software to lock and wipe information remotely

Resolving Consumer Complaints

- Immediate response to all issues (in person, via phone or email)
- 100% guarantee of all work performed: either free redo of notary work or refund of payment

References

Information Stewardship and Security Awareness Training, Notary Public Edition, GLBA Training Module Version 1.0.

MIS Signing Agent Information Policy for Loan Document Disposal, Mortgage Information Services, 2013.

Agreement for Signing/Notary Services by Individual Provider, Old Republic Title, 2014.