

Personal Information Privacy - Customers

	Policy & Procedure Manual
Nu World Title	Document: Customer Privacy Policy
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1. Purpose

This Customer Privacy Policy is designed to protect the security, confidentiality and integrity of Personal Information across all operations of Nu World Title to meet customer expectations, protect market reputation and comply with applicable laws and regulations.

The policy encompasses principles, practices and institutional controls for the protection of Personal Information to be implemented throughout the Nu World Title's operations.

1.1. Scope

The Customer Privacy policy applies to all collection, storage, use, sharing and management of Customer Personal Information by or at the direction of Nu World Title.

1.2. Application

The Customer Privacy policy applies to all permanent and temporary employees, contractors and others processing Customer Personal Information (PI) on behalf of Nu World Title.

This policy governs all processing of customer Personal Information, including prospective, current and former customers, when soliciting, providing services, marketing products and services, communicating, and other activities.

2. Personal Information Privacy for Customers Policy

Nu World Title shall process Customer Personal Information (PI) only in ways that are fair, lawful and appropriate to our legitimate business activities.

Our privacy commitments include:

- Limits on processing PI to that which is lawful, fair and necessary to accomplish a legitimate business purpose;
- Public notification of our information processing practices;
- Limits on PI disclosures to those that are authorized and limited to legitimate business purposes;
- Processing and handling conditions that protect PI from unauthorized use, disclosure, corruption or loss.

2.1. Processing Limits

Nu World Title shall limit its PI processing to those that are necessary:

- To fulfill company obligations under a contract or at the direction of the Customer, or;
- To provide a product or service requested by the Customer or the Customer's authorized representative, or;
- About the legitimate interests of the company, a Third-Party or Service Provider to whom the PI is disclosed, except where such interests are outweighed by the fundamental rights of the Customer, or;
- To establish or assert legal rights, defend against legal claims or obtain legal advice, or;
- To comply with a legal obligation, or;
- To protect the vital interests of the Customer or another individual.

2.2. Privacy Notices

Nu World Title shall post notifications of its customer privacy practices written in clear language, in conspicuous places, for public access and viewing.

2.3. Correction of Personal Information

Subject to authorized requests, corrections to records containing PI shall be made in a timely manner.

2.4. Collection and Purpose Limitations

The company shall collect, use and retain only that personal information that is reasonably needed for the intended purpose. The PI collected and retained shall be logically and appropriately limited to that which is needed to provide the offered services.

2.5. Limits on Personal Information Disclosures

Nu World Title shall limit its disclosures of PI to those with a legitimate business interest compliant with applicable laws and regulations.

2.6. Securing Personal Information

All PI shall be protected from unauthorized access, disclosure, use, corruption or loss. Processing, handling and management of Personal Information shall conform with the company's Information Security policy and include administrative, physical and technical controls.

2.7. Administrative, Physical and Technical Controls

All personal information held by Nu World Title shall be protected from unauthorized use, disclosure, corruption or loss in compliance with the [Information Security and Protection](#) Policy.

2.8. Service Provider Selection

Nu World Title shall take reasonable and necessary precautions in selecting third-parties with whom to share PI, requiring that all such service providers shall comply with all aspects of this and related policies, including the [Information Security for Third Parties](#) Policy.

2.9. Responsibilities

All managers, employees, contractors, service providers and third parties acting on behalf of Nu World Title are responsible for complying with the requirements of this policy.

Employees, contractors and others shall, at all times, safeguard PI by preventing unauthorized use, access or disclosure and shall not fulfill requests for PI until the requester's identity and authority are authenticated. All PI, whether in digital or printed form, shall not remain exposed and unattended and shall remain under the control of responsible individuals at all times.

2.10. Enforcement

All owners, employees, contactors, vendors and service providers must comply with the terms of this policy. Violations of this policy may result in disciplinary actions up to and including termination.

3. Information Privacy Procedures

This policy shall be implemented through the actions of employees, contractors, service providers and third-parties working directly for or on behalf of Nu World Title.

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3.1. Privacy Notices

Disclosures of the company [Privacy Statement](#) shall be displayed in print and digital form. Such notices shall be displayed prominently and kept up-to-date.

3.2. PI Access Requests

A process shall be developed, supported and maintained by which individuals may request copies of the personal information held by the company about them, whether that information was collected directly from the individual or from another source.

All requests are subject to verification of the requester's authorization to review the requested record. That verification must be thorough and achieve high confidence, if not certainty, that the requester is the same person as the individual to whom the record pertains.

After verifying the requester's authority, the company shall produce the personal information record in a reasonable time and at a reasonable cost. The individual may challenge the accuracy of the information and may request changes, though the company is not obligated to make the requested changes.

3.3. Privacy Breaches

All individuals covered by this policy shall immediately report suspected incidents of violations of this policy per the Security Breach Incident Reporting and Management Policy.

and distribution of revised policy including dates and places of postings

4. Related Documents

The [Customer Privacy](#) policy requires all affected individuals to comply with the following related policies:

[Employee Data Protection Policy](#)

[Acceptable Use of Company Resources Policy](#)

[Information Security and Protection Policy](#)

[Information Security for Third Parties Policy](#)

[Security Breach Incident Management Policy](#)

Definitions

Customer

Individuals to whom the company is providing a product and/or service either directly or indirectly.

Customer Personal Information

Information about a person that, alone or linked with other information, can be used to identify, contact or locate an individual. Customer personal information includes information about a customer's spouse, dependents and others.

PI Collection

All personal information gathered, directly or indirectly, to support providing a product or service to an individual person.

PI Storage

The retention of personal information in all forms, digital, printed and oral, about an individual person.

PI Use

The utilization of personal information to provide a product or service, including data processing, marketing, promotion or direct communication.

PI Sharing

The disclosure of personal information for the purpose of providing a product or service to an individual.

PI Management

The maintenance, editing or updating of personal information for the purpose of retaining accurate data appropriate to a specified purpose.

Third Parties and Service Providers

Entities that are not directly related to Nu World Title, engaged to support the provision of products and services.