

Privacy Policy

Use of Site

At eMagic, we recognize the importance of maintaining the privacy of your information and we are committed to privacy practices that will protect the confidentiality of your business and consumer data. eMagic provides an Internet portal ("eMagic.com") that facilitates the ordering of various mortgage related products and services from Investors and/or Vendors represented on the site, and also hosts private applications for Investors and Vendors. For hosted applications, users should also review the privacy policies and terms of use posted at the originating site.

eMagic.com is a private system restricted to authorized users. eMagic.com is not a consumer site and does not collect any information from unauthorized users who access the welcome page but who do not have a Login ID and password.

Collection and Privacy of Information

Our privacy policy addresses two types of information:

1. "Business information" collected about your business through the Customer Profile form and registration process to become an authorized eMagic.com user, including information about your employees, and
2. "Consumer information" transmitted in the process of ordering and delivering products and services via eMagic.com.

Business Information Business information is used by eMagic to verify your eligibility and authorization to use eMagic.com and may be disclosed to consumer reporting agencies and to third party contractors and agents whose professional services are retained by eMagic.com to assist us in evaluating client eligibility. Business information is not made publicly available or sold by eMagic. We may disclose business information to our affiliates to provide additional products and improve service to you and to loan Investor and Vendor participants in eMagic.com for marketing and promotional purposes related to eMagic services. Investors and Vendors are prohibited from disclosing your business information to other third parties. Nonpublic personal information collected about your employees is not disclosed to Investors, Vendors, or other third parties, except as described above in connection with eligibility verification.

Consumer Information In the course of facilitating product and service orders, eMagic may receive from your company, lenders, loan brokers, correspondents, consumer reporting agencies, and other nonaffiliated third parties certain personal and financial information concerning loan applicants and borrowers, including nonpublic personal information, as such term is defined in Title V of the Gramm-Leach-Bliley Act and regulations promulgated pursuant to that Act, and customer information, as defined in the Interagency Guidelines Establishing Standards for Safeguarding Customer Information adopted jointly by the FDIC, FRB, OCC, and OTS (collectively, "consumer information"). Consumer information collected by eMagic includes loan application information, transaction information, such as payment history data, credit information about consumers, and information related to property owned by consumers.

Use and Disclosure of Consumer Information

It is the policy of eMagic to comply with all laws and regulations concerning use and disclosure of consumer information, including the Equal Credit Opportunity Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act and related regulations, as the foregoing apply to eMagic.

Consumer information is relayed by eMagic in connection with fulfillment of services requested and delivered via eMagic.com. eMagic discloses consumer information to nonaffiliated third parties only as authorized or requested by its clients to effect, administer, or enforce services on behalf of such clients. In addition, information may be disclosed pursuant to a court order, subpoena, or other administrative or legal proceeding. Use of consumer information is restricted to the purposes for which such information is provided and as otherwise permitted by law.

Consultants, subcontractors, or other nonaffiliated third parties who are given access to business or consumer information in connection with services performed for eMagic are required to sign confidentiality agreements restricting use and disclosure of such information to the persons who have a need to know the information in connection with the consulting assignment, or are otherwise restricted from using the information or disclosing the information to other third parties by contractual, legal, or fiduciary obligations to eMagic.

Subject to the foregoing statements, eMagic does not currently have any arrangements for or agreements with nonaffiliated entities which would permit access to or sharing of business or consumer information with a third party. In addition, at this time, eMagic does not sell business or consumer information to third parties and has no plans to do so.

Protection of Information

eMagic has adopted policies and practices designed to:

- Ensure the security and confidentiality of business and consumer information,
- Protect against any anticipated threats or hazards to the security or integrity of business and consumer information, and
- Protect against unauthorized access to or use of business and consumer information that could result in substantial harm or inconvenience to any client or consumer.

Such measures include access controls on computer systems which require users to log in with a unique user identification and password, "firewall" technology, access restrictions at physical locations where business or consumer information is maintained, encryption of information transmitted and stored electronically, employee screening, and monitoring of security measures, both internally and in connection with information shared with third parties, as described above.

Cybertrust Certification

eMagic.com has had its security controls, procedures and policies examined, measured and validated by Cybertrust, Inc., the global information security specialist.

Formerly TruSecure Certification, the Cybertrust Security Management Program Certification is a comprehensive and ongoing risk reduction program that addresses all aspects of proactive information security. More than a seal of approval, a Cybertrust Certified status demonstrates to the public that this organization has made safeguarding user information a critical priority. The Cybertrust Certified seal also demonstrates that this organization employs proven security processes and technologies to maintain a proactive and comprehensive information security program.

Links

eMagic.com contains links to other Web sites. Please be aware that our privacy policy and procedures apply only to our eMagic.com site. eMagic is not responsible for the privacy practices of other Web site operators. For information about the policies of any linked site, we encourage you to read the privacy statement posted at that site.

We reserve the right to make changes in our policy as we determine appropriate and in accordance with applicable law.