

Privacy Policy

Gregg & Valby, LLP recognizes the importance of privacy and the sensitivity of personal information. As attorneys, we have a professional obligation to keep confidential all information we receive within an attorney-client relationship. We are committed to protecting any Nonpublic Personal Information we collect and hold. To ensure this accountability, we have developed this policy, and we train our attorneys and support staff on our policies and practices. This Privacy Policy, along with our various Security policies, outlines how we manage personal information and safeguard our clients' and their borrowers' privacy.

Nonpublic Personal Information

Federal Law and Regulations define Nonpublic Personal Information as:

- (i) Personally identifiable financial information; and
- (ii) Any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information that is not publicly available.

Under Federal Law and Regulations, Nonpublic Personal Information does not include:

- (i) Publicly available information, [except any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information that is not publicly available]; or
- (ii) Any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived without using any personally identifiable financial information that is not publicly available.

Why Does Gregg & Valby, LLP Need Personal Information?

Gregg & Valby, LLP provides legal services and products to a wide range of clients. We can provide these services only if Personal Information is provided to us.

The Collection of Personal Information by Gregg & Valby, LLP

Personal information is any information that identifies you, or by which your identity could be deduced, such as your email address, name, home or work address, or telephone number. If we do not collect and use personal information, we could not provide the legal services our clients expect.

We collect information only by lawful and fair means, and not in an unreasonably intrusive way. Wherever possible, we collect personal information directly from our clients, both at the start of a transaction and in the course of our representation.

We collect Nonpublic Personal Information from the following sources:

- Information we receive from our clients from mortgage loan applications or other forms;
- Information about mortgage transactions in which we or others are involved; and
- Information we receive from a consumer reporting agency.

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Consent

In most cases, we will ask our clients to specifically consent, if we collect, use, or disclose their borrowers' personal information. Normally, we ask for consent in writing, but in some circumstances, we may accept your consent. Sometimes, consent may be implied through a course of conduct with us.

Use of Personal Information

Gregg & Valby, LLP collects and uses personal information to deliver the services our clients have requested. We use personal information to provide legal advice and services, to administer our clients' pending transaction, and to include our clients in various forms of communication. If we are told that our client no longer wishes to receive information from us, we will not send any further communications.

Gregg & Valby, LLP does not disclose personal information to any third party to enable them to market their products and services. For example, we do not provide our client mailing lists to any entity.

Disclosure of Personal Information

We do not disclose any Nonpublic Personal Information about our clients or former clients, or their borrowers, to anyone, except as permitted by law. Under certain circumstances, Gregg & Valby, LLP will disclose personal information:

- when we are required or authorized by law to do so; for example, if a court issues a subpoena;
- when there is consent to the disclosure;
- when the legal services we are providing requires us give personal information to third parties (for example, a lender in a real estate mortgage transaction), consent will be implied, unless we are told otherwise;
- where it is necessary to establish or collect fees;
- if we engage a third party to provide administrative services to us (for example, computer back-up services or archival file storage) and the third party is bound by our privacy policy;
- if we retain other law firms at our clients request and on its behalf;
- if the information is Publicly Available Personal Information, as it is defined above, under the Gramm-Leach-Bliley Act.

Updating Information

Since we use personal information to provide legal services, it is important that the information be accurate and up-to-date. If, during the course of the pending transaction, any personal information changes, please inform us so that we can make any necessary changes.

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Is Personal Information Secure?

Gregg & Valby, LLP takes all reasonable precautions to ensure that personal information is kept safe from loss, unauthorized access, modification, or disclosure. We restrict access to Nonpublic Personal Information to our attorneys and employees who need to know that information to provide products or services. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard all Nonpublic Personal Information. Among the steps taken to protect personal information are:

- premises security;
- restricted file access to personal information;
- two-factor authentication;
- deploying technological safeguards; for example, security software, encryption, and firewalls to prevent hacking or unauthorized computer access; and
- internal password and security policies.

Communicating with Us

You should be aware that email is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information by email. We have the ability to solicit personal information from you via secure email. Never send us any personal information without assuring that the information being sent is encrypted. Our proprietary document preparation system, GVDocs, also has a secure web-delivery system to ensure the protection and security of data and information exchange.

Changes to this Privacy Policy

Since Gregg & Valby, LLP regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time.

Website

We gather only aggregated information concerning those who visit our website, www.gregg-valby.com. If you do communicate with us through this site, we will use the information you provide to respond to your inquiries or requests, and for other internal purposes, including providing with you with any future notices or information concerning subjects in which you have expressed interest. We will not share or sell such information with or to third parties. We will not disclose individual information to third parties, unless specifically authorized or compelled to do so by legal process.

There is also information about your computer hardware and software that is automatically collected by our website. This information can include: your IP address, browser type, domain names, and access times. This information is used by Gregg & Valby, LLP for the operation of our website, to maintain quality of service, and to provide general statistics regarding use of our website.

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Our website contains links to other sites, which are not governed by this Privacy Policy.