



Web Privacy Policy

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Document Approvers

Associate General Counsel
Chief Compliance Officer

Summary

This document describes the standards Fairway Independent Mortgage Corporation (FIMC) follows regarding the importance of web privacy to FIMC and FIMC’s commitment to maintaining the security of personal information provided to visitors using its website. This policy also ensures users and visitors of FIMC’s internet website are aware of how FIMC collects, uses, protects, and manages personally identifiable information (PII).

FIMC’s mission is to act as a trusted advisor. This policy is only intended for individuals who reside in the United States. By using any of FIMC’s websites or mobile applications (referred to collectively as sites) in the United States or otherwise providing personal information to FIMC, the user agrees to the [Privacy Policy](#).

This policy applies to all information FIMC collects from its users or employees, whether permanent or temporary, the FIMC corporate website, and all FIMC individual branches and Loan Officer (LO) sites. All sites created through the Marketing Department are built using [SiteCore](#) and reviewed by the Information Security Department. The Information Security Department must approve any sites constructed on a platform other than [SiteCore](#). The Marketing and Legal Departments must approve a site’s content before it goes live.

End users who are not FIMC employees must read and understand this policy and report known or suspected privacy incidents to the [Legal Department](#).

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Information Collection

FIMC may collect information to provide better service during the user's interaction with FIMC's website:

- General information such as user identification (ID), pages visited, and services accessed by visitors
- User information
- Name
- Contact information, including email address
- Other information relevant to customer surveys, offers, or both
- Website registration

Notes:

- To use some features on the website, users must first complete a registration form.
- During registration, users must provide contact information such as name and email address; FIMC uses this information to contact users about the topics on FIMC's website for which the users have expressed interest and to enable users to retrieve lost passwords.
- It is optional for the user to provide demographic information such as mailing address, position, technical skills, etc.
- Browser information
Note: FIMC may collect certain standard browsing information, which the browser sends to every company website, such as the internet protocol (IP) address (browser type, language, access time) and referring website address.
- Cookies
Note: FIMC uses various technologies to collect and store information when the user visits FIMC's website, which may include sending one or more cookies or anonymous identifiers to the user's device.

PII

PII is any information that identifies the user as an individual and any other information FIMC associates with it. FIMC collects a few categories of information from various sources.

Information collected when the user accesses the sites, such as by FIMC's web servers and third-party analytics tools is as follows:

- FIMC's system logs may record certain information about visitors to the sites, including the web request, IP address, device and mobile ad identifiers, browser information, interaction with the sites, pages viewed, application usage, and other such information; FIMC may collect similar information from emails to help track which emails recipients open and which links they click.
- FIMC uses certain cookies, pixel tags, and other technologies to help understand how to use the sites and enable FIMC to personalize the user's experience.
Note: Refer to the [Cookie Policy](#) for more information.
- FIMC may detect the physical location of the user's device by, for example, using Global Positioning System (GPS) information collected by mobile apps or location information shared by a user's web browser. FIMC collects this information to enhance or facilitate services, such as enabling certain functionalities of the sites that provide the user with information about promotions or relevant product information; the user may opt out of the collection of this information by adjusting the settings on the device so information about the user's physical location is not sent to FIMC or a third party.

Use of PII

FIMC may use the information collected to provide, maintain, and improve services, develop new services, and protect FIMC and users. FIMC requires this information to understand user needs and to provide the user better services specifically for the following reasons:

- Internal record keeping
- Improvement of products and services
- To send promotional emails about new products, special offers, or other information FIMC thinks the user may find interesting, using the user-provided email address
- To contact customers, via email, phone, fax, or mail, for market research purposes

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FIMC may use personal information as permitted by law to:

- Respond to a user's inquiries and fulfill requests
- Send administrative information to a user
- Communicate with a user regarding loans, services, promotions, campaigns, programs, contests, and accounts
- Inform a user about FIMC's loan products, promotions, events, or other promotional purposes
- Recontact a user
- Send advertising and promotional material from any of FIMC's affiliates and on behalf of FIMC's promotional and strategic partners
- Improve the experience with FIMC's products and services

FIMC may also use personal information, as necessary, for certain essential purposes, including to:

- Comply with applicable law and legal process
- Respond to requests from public and government authorities, including public and government authorities outside the country of residence
- Detect, prevent, or investigate potential security incidents or fraud
- Facilitate the functionality of FIMC mobile applications and websites
- Provide important product safety information and notice of product recalls
- Enforce FIMC terms and conditions
- Protect FIMC operations and affiliates
- Protect FIMC rights, privacy, safety, property, security, and that of FIMC affiliates
- To allow FIMC to pursue available remedies or limit the damages that may be sustained

Use of Cookies

FIMC uses cookies to identify users who log in while on the sites. This allows website users to avoid logging in more than once. Users can set the browser to either accept or reject cookies or refuse all cookies by turning them off at the browser level. If users opt to disable cookies, website access is still possible; however, functionality is limited. No PII, such as email address or name, is collected with the cookies. Accepting cookies while on FIMC's site does not put the user at risk for marketing to other sites.

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Security of Personal Information

The FIMC website has security measures in place to protect the loss, misuse, and alteration of user information. The FIMC Information Security Program relies on the [National Institute of Standards and Technology \(NIST\) 800-series of standards](#) as the primary framework for control, design, implementation, and operation. Those controls include physical, technical, administrative, and procedural controls. FIMC continually invests in and enhances these controls to meet new threats and vulnerabilities. FIMC works with several leading Information security firms, which assist the implementation, operation, and review of FIMC's security controls. This includes periodic assessments and testing.

A significant part of FIMC's strategy is the implementation of application virtualization technology throughout FIMC. This technology significantly reduces the potential attack points by centralizing the location of borrower data in the data centers. FIMC replicates data between servers in primary and secondary data centers. Data is never put on tape or other physical media for transport.

All FIMC's associates are provided training on the protection of borrower information and are engaged in an active, continual Information Security Awareness program that keeps information security in focus throughout the year.

FIMC's primary tool for loan processing is the Encompass Loan Origination system by Ellie Mae. Third-party organizations provide additional services via the Ellie Mae Network. Data movement between Ellie Mae software clients to the central server is encrypted throughout transmission. Borrower information stored on the central server is also encrypted. Information passed through the Ellie Mae Network is encrypted throughout transit.

The Encompass **eFolder** functionality enables secure exchange of information between borrowers, LOs, and associates. FIMC's email system automatically establishes a layer of security with any correspondent email systems that support this encryption mechanism. FIMC uses an encrypted email system for communication with those who do not have access to a secure email system.

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FIMC uses standard physical, technical, and administrative measures designed to reduce the risk of loss, misuse, unauthorized access, disclosure, or modification of any personal information.

Sharing

FIMC shares collected demographic information with partners, sponsors, and donors. This is not linked to any personal information that can identify any individual person. Personal information is an element or combination of elements that uniquely identifies an individual such as their name in combination with a home address. Collected information is a summary of information about a group of individuals such as the number of borrowers who visited a particular area of a website versus another area.

Links

FIMC sites may contain links to other sites. FIMC does not claim any responsibility for the privacy practices of other sites. FIMC encourages users to be aware and read the privacy statements of every website that collects PII.

Notification of Changes

When FIMC makes changes to this policy, the new document is posted on FIMC's home page, so users are always aware of what information is collected, how it is collected, and under what circumstances, if any, it is disclosed. The use of the website following the changes means the user accepts the revised policy.

Related Documents

[Cookie Policy](#)

[Gramm Leach Bliley Act and the Safeguards Rule Policy](#)

[Privacy Policy](#)

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