

PRIVACY POLICY STATEMENT

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about a consumer with a nonaffiliated third party unless the institution provides the consumer with a notice of its privacy policies and practices, such as the type of information that it collects about the consumer and the categories of persons or entities to whom it may be disclosed.

In compliance with the GLBA, we provide the consumer with this Privacy Policy Statement, which sets out and notifies the consumer of the privacy policies and practices of **Pitt and Frank, LLC**, and **Pitt, Frank, Distler, Bearden & Henderson, P.S.C.** We believe that in disclosing this Privacy Policy Statement to the consumers and customers (as defined by GLBA), it will enable them to form a foundation of trust when using our services.

During our business, we may collect nonpublic personal information of consumers and customers from the following sources:

Information we receive from consumers and customers, or their authorized representatives on applications or other forms.

Information regarding transactions of consumers and customers with us that we secure from our files, or from our cloud-based, digital closing platform, Qualia Labs, Inc. (our cloud platform);

- For the Privacy Policy Statement of Qualia Labs, Inc., please visit <https://www.qualia.com/privacy-policy/>

Information we receive from the public records maintained by government entities that we either obtain directly from them, or from our affiliates or others.

Unless it is specifically stated otherwise in an amended Privacy Policy Statement, no additional nonpublic personal information will be collected about consumers and customers.

In compliance with the GLBA, our privacy practices regarding nonpublic personal financial information of consumers and customers (as defined by GLBA) are as follows, subject to any exceptions specifically permitted by law.

- We protect nonpublic personal information of customers and consumers. We allow access on a need-to-know basis only.
- We allow customers and consumers to review their nonpublic personal information that we have collected, and we allow them to provide us with requests for amendment or deletion of such information, to which we will reasonably respond.
- We require consent from a proper party to the transaction to provide nonpublic personal information relating to that transaction.
- We have implemented and maintain physical, electronic and procedural safeguards for protection of nonpublic personal information from unauthorized access or intrusion; we allow only authorized personnel and employees to review the information who need access in connection with providing products and/or services for other legitimate business purposes; we keep closed files in secure storage with limited access, we store the files on computer with limited password access, and we store files within our cloud platform which is enabled with multi-factor authentication access.

In compliance with the GLBA, we do not share nonpublic personal information about a consumer with any nonaffiliated third party, for any purpose, unless one or more of the following circumstances apply: we are required by law to do so, we are directed or given permission by the consumer, or we suspect fraudulent or criminal activities.

Our Privacy Policy Statement will continue to apply to consumers and customers after our services have been rendered and/or our customer relationship has ceased. This is for internal purposes only, such as auditing, quality control or customer analysis.

Pitt and Frank, LLC, and **Pitt, Frank, Distler, Bearden & Henderson, P.S.C.** reserves the right to revise this Privacy Policy Statement in order to maintain compliance with the applicable federal and state laws and regulations. If you have questions about this Privacy Policy, or if you would like to provide comments, please contact our Director of Business Operations at 502-895-9900.