

## Online Privacy Practices Statement

This notice describes the digital privacy practices of Elite Lender Services, Inc., including its d/b/a Elite Title and Escrow Services (“Elite”) and applies to anyone who interacts with us through Elite websites, emails and social media (“Digital Channels”). It explains how we may collect information from you through our Digital Channels and how we protect and use that information.

### Online Information Collection

When you use our Digital Channels, Elite collects information in several ways:

- If you use online banking services, we collect and use information as described in the Elite Lender Services, Inc. [Privacy Notice](#).
- **California residents** - View our [California Resident Privacy Notice](#), which supplements the TIAA, FSB Consumer Privacy Notice.
- Elite collects and uses your IP address to help diagnose problems with its servers and to administer the website. An IP address is like a telephone number for a computer on the Internet. Just as one can locate a phone number in the telephone book, computers can locate an IP address using a Domain Name Service Server. Elite uses your IP address and information transmitted from your computer to help identify your computer and browser as you move throughout our Digital Channels, and to gather general information such as where your Internet Service Provider is located or the type of service that you have. In many cases, this allows Elite to present a convenient, more customized experience to you.
- Our Digital Channels and our service providers may over time use cookies and similar technologies to collect information about which computers, email clients and browsers access our Digital Channels, and to keep track of you as you move through our Digital Channels and third party websites that have a business relationship with our service providers. Cookies are small text files or text identifiers that are placed on your computer by Elite and many other websites. Elite and our service providers use this information for a number of reasons, including to deliver content specific to your interests, assist with website traffic reporting (such as reporting unique visitor counts), provide client support, respond to your inquiries (including through the use of live chat or video session technologies), measure and report the level of engagement with Elite advertisements across our Digital Channels and on other websites, and provide you with advertisements tailored to your interests (also known as “Targeted Advertising”). In some cases, the information collected from cookies will be combined with other personally identifiable information in order to provide you with Targeted Advertising. We may also use cookies to collect personally identifying information to authenticate and/or remember user name upon login. If you choose, you may set your web browser to warn you each time before it accepts a cookie and allow you to choose whether you want to accept the cookie. You may also choose to obtain software that operates in conjunction with your browser to control cookie acceptance.
- Elite also collects information that you provide to us through your use of Digital Channels and their features to provide client support and to respond to your inquiries.

### Information Security

Protecting your information is important to Elite. We’ve instituted policies, procedures, employee training and communication programs designed for the purpose of protecting your information. Some examples of how Elite protects your information include the following safeguards that Elite applies to nonpublic personal information (NPI), as that term is defined and regulated under the Gramm-Leach-Bliley Act (15 U.S.C. § 6809(4)):

- Restricting access to NPI to only those persons with a business need to know the information in order to process or service client account(s).
- Contractually requiring third parties doing business with Elite to comply with all applicable privacy and security laws.
- Maintaining physical, electronic, and procedural safeguards that comply with applicable federal and state standards to safeguard NPI.

By using our online services, you acknowledge and agree that you will not, under any circumstances, disclose your password by telephone or any other means to any person, and you acknowledge that no person from Elite will ever ask you for your password and that our employees do not need and should not ask for your password. You agree not to provide your password to anyone claiming to represent us. You are responsible for all transactions made or authorized using your username and password. You agree that if you give your username or password to anyone or fail to safeguard their secrecy, you do so at your own risk.

## Sharing Information

We may share information that we collect online digitally and with trusted third parties according to the terms described in our Consumer Privacy Notice, including for purposes of providing client support and responding to your inquiries (including through the use of chat or video-based technologies). Third party service providers with whom we share personally identifiable information are contractually obligated to keep the information confidential and to use the information only to provide the services we have asked them to perform.

For a description of how Elite may share information collected from consumers who have applied for or obtained a consumer product or service from us, please refer to our Consumer Privacy Notice.

We will also share specific information about you with third parties with your valid express consent; if we are legally permitted to do so; or if we are compelled to do so to comply with valid legal processes such as a search warrant, subpoena or court order, or a valid administrative request from a law enforcement agency, or in the situation where we, in good faith, believe such information is necessary to prevent harm to you or others or to protect Elite's interests in a dispute with you. As with any business, it is possible that as our business develops, we might sell or buy online businesses or other assets. In such transactions, information about clients often is among the transferred assets. Accordingly, in the event that Elite or any of its assets is acquired by a third party, such information may be one of the transferred assets.

## Encrypted Email

Encrypted email not only provides authentication but also protects your privacy. Encryption software "scrambles" the message so that only the intended recipient can read the message. Encrypted email often supports a digital signature within the same process. When combined, encryption and a digital signature allows you to obtain both authentication and privacy. Elite encourages and supports the use of encrypted messages for communication with Elite.

## Fraud and Other Internet Risks

Elite maintains customer authentication procedures to protect your personal information and account from identity theft. These procedures are for your protection. If you suspect a website is "spoofing" or pretending to be an Elite website, do not enter personal information but instead please contact us by calling 1-855-567-4691, or send an email to [fraud@TIAABank.com](mailto:fraud@TIAABank.com).

## Information Collected in Surveys

From time to time, Elite's website may use online surveys that ask you for contact information (such as your email address) and demographic information (e.g., zip code, age or income level). Elite uses this contact and demographic data to send you information about Elite and promotional material from certain partners. Elite may also send you online surveys to solicit feedback on your experiences with Elite. This information will be used as a way to continually improve the products and services we provide.

## Links to Other Websites

The Elite website may contain links to other websites. Elite is not responsible for the privacy practices or the content of non-Elite websites. Please review the privacy statement found on each of these sites when linking through.

## Privacy Issues Contact Information

If you would like more information about Elite's privacy practices, or would like to report anything that you consider unusual or inappropriate, please contact us at 1-855-567-4691, or send an email to [privacy@TIAABank.com](mailto:privacy@TIAABank.com).

## Protecting Children's Online Privacy

Elite encourages protection of children's information on the Internet. We will not intentionally collect personal information from children under 13 on our website without first obtaining consent from their parents or legal guardians. For more information about the Children's Online Privacy Protection Act (COPPA) please refer to the [Federal Trade Commission's website](#).

## Changes

This notice describes our current online privacy practices. Elite may change its online privacy practices in the future, and we may revise this notice to reflect material changes. If we do change our policy, we will note those changes on our website. A message will be displayed on our homepage for a period of time that a change has been made. We may also send an email describing the changes. Your continued use of the website following the posting of changes to these terms will mean that you accept those changes.