



Table of Contents

- 1) Introduction
- 2) Licensing
- 3) Accounting
- 4) Privacy and Information Security
- 5) Disaster Recovery Plan
- 6) Recorded Documents and Settlement Pricing
- 7) Final Title Policy Procedure
- 8) Insurance
- 9) Consumer Complaints



**The American Land Title Association's
Title Insurance and Settlement Company Best Practices
As Performed at National Title Agency
Updated June 1, 2015**

As President & CEO of National Title Agency, I'm pleased to provide you with our company's policies and procedures in conjunction with the American Land Title Association's Best Practices.

National Title Agency was founded in 1993 and operates in the States of New Jersey and Pennsylvania. Our business is regional and our clients are like family- earning their trust and maintain longstanding relationships with them is our goal.

Our company currently employs 10 full-time and 4 part-time employees. Training and Continuing Education are paramount to our mission. National Title Agency is active in the title industry's state and national land title associations.

The American Land Title Association's (ALTA's) Title Insurance and Settlement Company Best Practices are a way for National Title Agency to demonstrate its commitment to our clients, to our goal of striving to always improve upon what we do, and to earn the trust of those with whom we do business.

If you have any questions about our Policies and Procedures documents included in this manual, please feel free to contact me personally.

I look forward to our continued working relationship and want to thank you for your business.

Respectfully Submitted,

Lou Forrester
President & CEO



Biography

National Title Owner- Louis Forrester

Louis (Lou) Forrester is the President and Chief Executive Officer for Mortgage Lenders Services Inc., trading as National Title Agency. Lou founded National Title Agency in 1993 for the purpose of providing a high level of standard and service to the mortgage lending and real estate industry. Lou developed a successful model that employs a proprietary platform and proactive approach to title insurance. From the delivery of title commitments, clearing, and closings, to the issuing of title insurance policies, his system provides clients with an effective, easy, and rapid avenue to settlement allowing professionals to focus on generating loans and selling real estate.

Lou has an extensive background in the mortgage services and real estate industry, which began in 1980 when he joined ITT Financial Services and rapidly rose to the position of Assistant Vice President. Lou fulfilled this position until 1984 when he was employed as Vice President by Lender's Services Inc., a national title agency and appraisal management company until 1989, when Lou was recruited by Security Savings and Loan Association to develop a title insurance agency and credit reporting subsidiary called Evergreen Lending Services. Lou remained with Evergreen Lending Services until June of 1993.

Energetic, passionate, generous, honorable, and humble, are adjectives and phrases often used to describe Lou's character, and achievements.

A sampling of professional accomplishments, and accreditations.

- Studied at Rutgers University BS Economics
- Member of American Land Title Association
- Founding officer of Evergreen Lending Services Inc.
- Life time member of the fraternal order of police officers
- New Jersey licensed title insurance producer
- Pennsylvania licensed title insurance producer
- Managing partner LAF enterprises
- Chief operating officer of Forrester and associates incorporated



Personnel

Name

Lou Forrester

Rose Engel

Cynthia Cline

McCall Prager

Brett Riley

Kristen Forrester

Christine Skill

Erica Benoff

Last Updated: June 1, 2015

Licensing Monitoring



Date Updated: 6/1/15

- Objectives:
1. To actively monitor all agency and agent licenses to ensure they are current
 2. To actively pursue additional licenses where necessary or encourage additional employees to become licensed.
 3. To provide a consistent method of communicating new and expired licenses with underwriters.

Note: Copies of actual licenses retained include but are not limited to insurance producer, closer, abstractor, and notary.

Note: Copies of actual licenses are kept electronically in the National Title Agency main network drive in a folder "Licensing".

Note: Copies of all completed continuing education materials for license renewals are kept electronically in the National Title Agency main network drive in a folder entitled "Licensing".

Name/Entity	State	License Type	License#	Expiration Date
NTA Corporate	NJ	Agency	9360418	May 31, 2017
NTA Corporate	PA	Agency	61656	June 29, 2016
Lou Forrester	NJ	Agent	895950	Dec. 31, 2015
Lou Forrester	PA	Agent	14518	Dec. 31, 2015
Cynthia Cline	NJ	Agent	1530439	July 31, 2017



Policies and Procedures

Licensing

Purpose To document mandated insurance licenses and corporate registrations (as applicable) so that National Title Agency is able to remain in good standing with each state in which they conduct business.

Scope These policies and procedures are for all of National Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.

Procedures Licensing

The Company maintains active agency (business entity) licenses as well as agent (employee, owner, producer, and notary) licenses. When necessary, the Company also maintains active non-resident state licenses.

The following people are licensed in accordance with state specific regulations:

- Persons who give rate quotes
- Persons who discuss coverage and exceptions
- Persons who sign commitments
- Persons who sign policies

A tracking report (attached) is maintained by the Administrative Assistant as a monitoring control and periodically reviewed by the President to ensure the appropriate business professionals are licensed and renewed when necessary.

Licensed individuals, along with their active licenses, have been communicated to our underwriters. The underwriters are notified when a license becomes inactive.

Licensed individuals maintain the necessary continuing education requirements including any necessary ethics requirements. Documentation is maintained as evidence that the requirements have been met.

The Company maintains and has on file the appropriate American Land Title Association Policy Forms License.

Contact Officer	Lou Forrester, President & CEO
Date Approved	June 1, 2015
Date of Commencement	June 1, 2015
Amendment Dates	N/A
Date for Next Review	December 31, 2015

Related References and Links

- The 'License Monitoring Tracking Report' is kept on the National Title Agency network drive in a folder entitled "Licensing".
- Completed Continuing education materials for each licensee are kept on the National Title Agency network drive in a folder entitled "Licensing".
- Active licenses (agency and agent) are kept in electronic copy on the National Title Agency network drive in folders entitled "Employee Licenses" and "Agent Licenses". Hard copies are also kept in the Administrative Assistant's file drawer in folders entitled "Employees Licenses" and "Agent Licenses".



Policies and Procedures

Escrow/Trust Accounting

Purpose Document escrow/trust internal controls are in place to meet requirements for the safeguarding of client funds and to minimize the exposure to loss of client funds.

Scope These policies and procedures are for all of National Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.

Procedures **Escrow funds and operating accounts are separately maintained.**

The Company maintains 2 accounts: 1 Interest on Trust Account (IOTA) and 1 Escrow Account for real estate and mortgage loan transactions. Escrow/trust funds The Company maintains under a fiduciary capacity are not commingled with The Company's operating funds or an employee or manager's personal account.

Escrow/ Trust Accounts Trial Balance Reports.

A trial balance report depicting the balance of a particular customer's funds can be produced for each escrow/trust account at any time. This report depicts all individual customer file balances that do not have a zero balance. On a monthly basis, the Accounting Assistant reconciles the trial balance report to the bank balance and reconciled book balance, creating a "three way" reconciliation.

Trial balance reports are produced for each escrow/trust account maintained by The Company, including recording accounts and underwriter premium accounts.

Escrow/Trust Account Reconciliation

It is the responsibility of the Accounting Assistant to reconcile the escrow/trust accounts. Account receipts and disbursements activity are reconciled daily (two-way). Monthly, a three way reconciliation between the bank records, book records, and trial balance is performed. This reconciliation is completed within 7 business days of receipt of bank statement.

A listing is kept of all escrow/trust accounts. This listing includes underwriter premiums accounts, recording accounts and dormant accounts.

Escrow/trust account reconciliations are performed by the Accounting Assistant who does not have check signing authority or the capability/authority to perform wire transfer transactions.

Each month escrow/trust account reconciliations are reviewed by Company management and evidence of the review is documented. The escrow/trust account reconciliations are available to the title insurance underwriter at any time requested.

Escrow/trust account reconciliation items are clearly noted on the reconciliations. These reconciling items are followed up and addressed by the Accounting Department Manager within 4 business days of completion of the reconciliation so as to not carry over on the reconciliations from month to month.

The President & CEO reviews and signs off on all 3-way reconciliations within 5 business days.

Escrow/Trust Accounts are properly labeled and maintained in insured institutions.

Escrow/trust bank accounts are appropriately designated as “escrow” or “trust” accounts. This designation is noted in the original banking agreements as well as on our check stock, deposit slips, and bank statements. Unless mandated by the state regulation or directed by a customer with a signed agreement, escrow/trust accounts are maintained with insured financial institutions.

Dormant file balances.

Customer files that continue to hold funds after the settlement date are reviewed periodically to determine if any disbursements have been made. The President & CEO’s approval is required for any disbursement from an inactive escrow. An inactive escrow is defined as any escrow which has had no activity for the past 6 months. This approval is documented and maintained.

Banking Transactions conducted by authorized employees.

Via agreements with financial institutions, The Company management authorizes employees for escrow/trust bank account transactions. Wire transfer initiation and approval levels are set by The Company and reviewed for changes in staff routinely. Former employees are immediately deleted as signatories and authorized wire transfer individuals. A list of authorized

individuals is maintained in the Escrow Account Information Report. The individual(s) designated as the 'wire transfer administrator' to set-up and change online banking permissions has been authorized by management.

Authorized check signers and wire individuals do not maintain the escrow/trust accounting records or perform the escrow/trust account reconciliations.

Positive Pay, ACH Blocks, and international wire blocks are used.

The "Positive Pay" feature offered by our financial institutions is used on escrow/trust accounts. The Accounting Department Manager reviews the positive pay exception report daily. All positive pay reports are maintained and any exceptions are documented and explained.

ACH blocks and international wire blocks are placed on all escrow/trust accounts to prevent unauthorized users from withdrawing funds from the escrow/trust account.

Background checks.

Before an individual is hired, a background check (criminal and credit) is performed by BCheck Incorporated. Every year a background check (including criminal and credit) is performed on existing employees who have access to escrow/trust account funds.

Escrow/trust account training.

The Company provides escrow/trust account training as needed to individuals handling customer funds and conducting escrow/trust account reconciliations. This training is conducted by the Accounting Department Manager. All training and continuing education is tracked and maintained by the Administrative Assistant.

Contact Officer Lou Forrester President & CEO

Date Approved June 1, 2015

Date of Commencement June 1, 2015

Amendment Dates N/A

Date for Next Review Monthly

Related References and Links

- Policies and procedures relating to escrow accounting and trust accounts are kept on the National Title Agency network drive in a folder entitled “Escrow Trust Accounting P&P”.
- Banking agreements and wire transfer user reports are kept on the H drive in the personal documents folder of the President/CEO of National Title Agency in a folder entitled “Bank and Wire Info”.
- Escrow Account Info is kept on the National Title Agency H drive in the personal documents folder of the Accounting Department Manager drive in a folder entitled “Escrow Account Info”. This is a summary of pertinent escrow account information.



Policies and Procedures

Privacy and Information Security

Purpose Document a privacy and information security program (policies and procedures) to ensure National Title Agency maintains written protocols for the protection of data and Non-public Personal Information (NPI).

Scope These policies and procedures are for all of National Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.

Procedures The Company has a formal privacy and information security program that is appropriate with the size and complexity, the nature and scope of the Company's activities and the sensitivity of the information in the Company's possession. As part of this program, The Company maintains a Privacy Policy Notice (see attached) that is posted on The Company's website and provided to customers and consumers for each order processed. Additional information about The Company's privacy and information security program is available to consumers and customers upon request.

The Company policies associated with the privacy and information security program are given to all employees and the employees must acknowledge in writing that they have read and understand such policies. It is the responsibility of Office Manager to ensure The Company has received all employee acknowledgments.

The Company makes an assessment annual basis of the standards and requirements affiliated with The Company's information security program, including those set out in this policy and procedure document. This assessment is conducted by BCheck Incorporated and a formal report on compliance is issued to The Company Management.

Physical Security of NPI

The Company utilizes BCheck Incorporated as the information provider for background and credit checks. The Company individuals who have access to NPI is restricted to authorized principals and employees who have undergone a formal background check and credit report process which identified no irregularities.

Removable media devices, including but not limited to external hard drives, compact discs, magnetic tapes and USB/flash drives are issued by the Company with the approval of the President & CEO. The use of removable media devices is prohibited unless the President & CEO has authorized such use. Removable media is kept in a secure area and accounted for via the Office Manager when not in use.

Other standard procedures for security of NPI include closing paper files other than the one currently being worked on, stow files away when away from workspace and lock desks and file cabinets at the end of the day. Hardcopy NPI that is transmitted outside The Company is done so using only secured envelopes and/or locked document bags.

Network Security of NPI

At the direction of the President & CEO, The Company's designated Network Administrator grants appropriate access to The Company's various computer technology applications. The Company's file server(s) or main central processing unit is housed in a room with a secure door. The Company's computer network utilizes up-to-date anti-virus, anti-spyware and data encryption software applications. The Network Administrator is responsible for such software maintenance.

Access to The Company's information technology computers and network is secured by individual and unique passwords. The Company utilizes a computer application that prompts employees to change passwords in regular frequency every 90 days. All The Company's computers no matter, desktop or laptop run a "screen timeout" application causing automatic system sign off when the system detects no activity for a period of 10 minutes.

Disposal of NPI

The Company has defined and communicated to employees the types of data/information that falls into the NPI category. Any NPI data is disposed of accordingly. Paper records by shredding. Small shredders are available throughout the office. Large, secure shredding bins provided by Shred It can also be found in the office. When disposing of computers and portable storage devices, The Company uses a software application to erase/wipe clean the device.

Disaster Management Plan for NPI

The Company has a documented disaster management plan to ensure adequate back-up, recovery and business continuation procedures. The plan also includes

required procedures for notification and response to security incidents and breaches. The plan is call IT Disaster-Recovery Plan. The Company also maintains insurance coverage for such circumstances. The disaster management plan is reviewed on an annual basis the Office Manager and President & CEO and updated as appropriate.

Security Practices of Independent Service Providers

If independent service providers for The Company receive NPI from The Company, The Company shares this policy document with the service provider and/or conducts appropriate due diligence of the NPI security measures of the service provider before transmitting any NPI data. Service providers are aware they must notify The Company regarding NPI security breaches of NPI data that has been transmitted.

If security breaches occur, proper notification is provided to consumers and law enforcement in accordance with The Company's privacy and information security program and disaster management plan.

Approval from Secure Sites

To ensure our customers that their clients information is protected we are approved by several online security systems and agencies. Our approval can be found at the following systems and on their websites:

Secure Settlements

Better Business Bureau

Administration Closing

Closing Insight

Contact Officer Lou Forrester, President & CEO

Date Approved June 1, 2015

Date of Commencement June 1, 2015

Amendment Dates N/A

Date for Next Review June 1, 2016

Related References & Links

Internal Company Policies:

- Policies and procedures relating to privacy and information security are kept on the National Title Agency network drive in a folder entitled "Privacy and Information Security", document name "Privacy and Information Security P&P".

- The Company's information security program and disaster management plan are kept on the H drive in the personal documents folders of the President/CEO and the Office Manager of National Title Agency in folders entitled "Information Security" and "Disaster Recovery".
- The Company's "Privacy Policy Notice" document is kept on the National Title Agency network drive so that employees may access it and utilize as necessary.
- Reference any specific privacy and information security program policies and where they are kept.



Privacy Policy Notice

Purpose of this Notice

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 you with a nonaffiliated third party unless the institution provides you with a notice of its privacy policies and practices, such as the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, we are providing you with this document, which notifies you of the privacy policies and practices of National Title Agency.

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you such as on applications or other forms.
- Information about your transactions we secure from our files, or from [our affiliates or] others.
- Information we receive from a consumer reporting agency.
- Information that we receive from others involved in your transaction, such as the real estate agent or lender.

Unless it is specifically stated otherwise in an amended Privacy Policy Notice, no additional nonpublic personal information will be collected about you.

We may disclose any of the above information that we collect about our customers or former customers to our affiliates or to nonaffiliated third parties as permitted by law.

We also may disclose this information about our customers or former costumers to the following types of nonaffiliated companies that perform services on our behalf or with whom we have joint marketing agreements:

- Financial service providers such as companies engaged in banking, consumer finance, securities, and insurance.
- Non-Financial companies such as envelope stuffers and other fulfillment service providers.

WE DO NOT DISCLOSE ANY NONPUBLIC PERSONAL INFORMATION ABOUT YOU WITH ANYONE FOR ANY PURPOSE THAT IS NOT SPECIFICALLY PERMITTED BY LAW.

We restrict access to nonpublic personal information about you to those employees who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.



Disaster Recovery Plan

Section 1. Major goals of this plan

The major goals of this plan are the following:

- To minimize interruptions to the normal operations
- To limit the extent of disruption and damage.
- To minimize the economic impact of the interruption.
- To establish alternative means of operation in advance.
- To train personnel with emergency procedures.
- To provide for smooth and rapid restoration of service.

Section 2. Personnel- See Attached

A current list of employees with contact information is attached to this plan.

Section 3. Application profile

Use the Display Software Resources (DPSFWRSC) command to complete this table.

Application profile

	Critical?	Fixed Asset?		
Application Name	Yes/No	Yes/No	Manufacturer	Comments
RamQuest	Yes	Yes	RamQuest	1
QuickBooks	Yes	Yes	Intuit	1

Comment Legend:

1. Runs daily _____.
2. Runs weekly on _____.
3. Runs monthly on _____

Section 4. Inventory Profile

A current asset list is attached to this plan.

This list should include the following:

- Processing Units
- Disk Units
- Models
- Workstation Controllers
- Personal computers
- Spare workstations
- Telephones
- Air conditioner or heater
- System printer
- Tape and diskette units
- Controllers
- I/O processors
- General data communication
- Spare displays
- Racks
- Humidifier or dehumidifier

Section 5. Information Services Backup Procedures

- iSeries Server
 - Journal receivers are not utilized; a back-up server is in place.
 - Daily, a save of changed objects in the following libraries and directories is done at 1:00 p.m.:
 - Shared Drive
 - F Drives
 - On Saturdays at midnight a complete save of the system is done.
 - Save media is stored off-site through external hard drives.
- Personal Computer
 - Files are not stored on the local PC's. Instead, all work is done in the shared directories or F Drives and is backed up per the procedures outlined above on Saturdays at midnight. It is then saved with the normal system save procedure.

Section 6. Disaster Recovery Procedures

The National Title Agency Disaster Recovery Plan addresses the following three elements:

Emergency Response Procedures

To document the appropriate emergency response to a fire, natural disaster, or any other activity in order to protect lives and limit damage.

Backup Operations Procedures

To ensure that essential data processing operational tasks can be conducted after the disruption.

Recovery Actions Procedures

To facilitate the rapid restoration of a data processing system following a disaster.

Disaster Action Checklist

1. Plan Initiation
 - a. Notify senior management
 - b. Contact and set up disaster recovery team
 - c. Determine degree of disaster
 - d. Implement proper application recovery plan dependent on extent of disaster (see Section 7. Recovery plan—mobile site)
 - e. Monitor progress
 - f. Contact back up site and establish schedules
 - g. Contact all other necessary personnel—both user and data processing
 - h. Contact vendors—both hardware and software
 - i. Notify users of the disruption of service
2. Follow-Up Checklist
 - a. List teams and tasks of each
 - b. Obtain emergency cash and set up transportation to and from backup site, if necessary
 - c. Set up living quarters, if necessary
 - d. Set up eating establishments, as required
 - e. List all personnel and their telephone number
 - f. Establish user participation plan
 - g. Set up the delivery and the receipt of mail
 - h. Establish emergency office supplies
 - i. Rent or purchase equipment, as needed
 - j. Determine applications to be run and in what sequence
 - k. Identify number of workstations needed
 - l. Check out any off-line equipment needs for each application
 - m. Check on forms needed for each application
 - n. Check all data being taken to backup site before leaving and leave inventory profile at home location
 - o. Set up primary vendors for assistance with problems incurred during emergency
 - p. Plan for transportation of any additional items needed at backup site
 - q. Take directions (map) to back up site
 - r. Check for additional magnetic tapes, if required
 - s. Take copies of system and operational documentation and procedural manuals.
 - t. Ensure that all personnel involved know their tasks

- u. Notify insurance companies

Recovery start-up procedures for use after a disaster

1. Notify Disaster Recovery Services of the need to utilize service and of recovery plan selection.

Note:

Guaranteed delivery time countdown begins at the time Disaster Recovery Services is notified of recovery plan selection.

- a. Disaster Notification numbers
856-334-5474 or 856-770-4306

These telephone numbers are in service from 7 am until 11 pm Monday through Friday.

2. Disaster notification number: 856-334-5474 answering services

This telephone number is in service for disaster notification after business hours, on weekends, and during holidays. Please use this number only for the notification of the actual disaster.

3. Provide Disaster Recovery Services with an equipment delivery site address (when applicable), a contact, and an alternate contact for coordinating service and telephone numbers at which contacts can be reached 24 hours a day.
4. Contact power and telephone service suppliers and schedule any necessary service connections.
5. Notify Disaster Recovery Services immediately if any related plans should change.

Section 7. Recovery plan-mobile site

Basic Protocol

1. Notify Disaster Recovery Services of the nature of the disaster and the need to select the mobile site plan.
2. Confirm is writing the substance of the telephone notification to Disaster Recovery Services within 48 hours of the telephone notification.
3. Confirm all needed backup media are available to load the backup machine.
4. Prepare a purchase order to cover the use of backup equipment.

5. Notify Disaster Recovery Services of plans for trailer and its placement (on West side of office building). (See the Mobile site setup plan in this section.)
6. Depending on communication needs, notify the telephone company of possible emergency line changes.
7. Begin setting up power and communications.
8. When the trailer arrives, plug into power and do necessary checks.
9. Plug into the communications lines and do necessary checks.
10. Begin loading system from backups (see Section 9. Restoring the Entire System).
11. Begin normal operations as soon as possible:
 - a. Daily jobs
 - b. Daily Saves
 - c. Weekly Saves
12. Plan a schedule to back up the system in order to restore on a home-based computer when a site is available. (Use regular system backup procedures).
13. Secure mobile site and distribute keys as required.
14. Keep a maintenance log on mobile equipment.

Communication Disaster Plan

We have a calling and email tree that has been distributed to owners and managers. In the event of a disaster, the tree is put into motion. This notifies all employees to the status of the disaster and when to return to work.

Electrical Service

Electrical service is provided by PSE&G. The emergency contact number for power outages is 1-855-249-7734. The electrical mast is on the exterior of the building on the south side. We have 250 amp service.

Section 8. Recovery plan-hot site

Basic Protocol

*The disaster recovery service provides an alternate hot site. The site has a backup system for temporary use while the home site is being reestablished.

1. Notify Disaster Recovery Services of the nature of the disaster and of its desire for a hot site.
2. Request air shipment of modems to 2508 Eagle Row Marlton, NJ 08053.
3. Confirm in writing the telephone notification to Louis Forrester within 48 hours of the telephone notification.
4. Begin making necessary travel arrangements to the site for the operations team.
5. Confirm that all needed tapes are available and packed for shipment to restore on the backup system.
6. Prepare a purchase order to cover the use of the backup system.

7. Review the checklist for all necessary materials before departing to the hot site.
8. Make sure that the disaster recovery team at the disaster site has the necessary information to begin restoring the site. (See Section 12. Disaster site rebuilding).
9. Provide for travel expenses (cash advance).
10. After arriving at the hot site, contact home base to establish communications procedures.
11. Review materials brought to the hot site for completeness.
12. Begin loading the system from the save tapes.
13. Begin normal operations as soon as possible:
 - a. Daily jobs
 - b. Daily saves
 - c. Weekly saves
14. Plan the schedule to back up the hot-site system in order to restore on the home-base computer.

Section 9. Restoring the entire system

To get your system back to the way it was before the disaster, use the procedures on the recovering after a complete system loss in the *Backup and Recovery*.

Before You Begin: Find the following tapes, equipment, and information from the on-site tape vault or the off-site storage location.

- If you install from the alternate installation device, you need both your tape media and the CD-ROM media containing the Licensed Internal Code.
- All tapes from the most recent complete save operation.
- The most recent tapes from saving security data.
- The most recent tapes from saving your configuration, if necessary.
- All tapes containing journals and journal receivers saved since the most recent daily save operation.
- All tapes from the most recent daily save operation
- PTF list (stored with the most recent complete save tapes, weekly save tapes, or both).

Section 10. Rebuilding Process

The management team must assess the damage and begin the reconstruction of a new data center.

If the original site must be restored or replaced, the following are some of the factors to consider:

- What is the projected availability of all needed computer equipment?
- Will it be more effective and efficient to upgrade the computer systems with newer equipment?
- What is the estimated time needed for repairs or construction of the data site?
- Is there an alternative site that more readily could be upgraded for computer purposes?

Once the decision to rebuild the data center has been made, go to Section 12. Disaster site building.

Section 11. Testing the disaster recovery plan

In successful contingency planning, it is important to test and evaluate the plan regularly. Data processing operations are volatile in nature, resulting in frequent changes to equipment, programs, and documentation. These actions make it critical to consider the plan as a changing document. These checklists are used to decide what areas should be tested.

****Done on a monthly Basis***

Item	Yes	No	Applicable	Not Applicable	Comments
Availability of support equipment, such as air conditioners and dehumidifiers.					
Availability of supplies: supplies, transportation, and communication.					
Distribution of output produced at the recovery site.					
Availability of important forms and paper stock.					
Ability to adapt plan to lesser disasters.					

Section 12. Disaster site rebuilding

- Floor plan of data center.
- Determine current hardware needs and possible alternatives. (See Section 4. Inventory Profile.)
- Data center square footage, power requirements and security requirements.
 1. Square footage 350
 2. Power requirements 110 and 220 volt circuits.
 3. Security requirements: locked area, preferably with combination lock on one door.
 4. Floor-to-ceiling studding
 5. Detectors for high temperature, water, smoke, fire and motion.
 6. Raised floor



Policies and Procedures

Document Recordation/ Title & Settlement Pricing

Purpose	Document recordation and rate/pricing procedures and policies to assist National title Agency in compliance with applicable contractual obligations and Federal and State Consumer Financial Laws.
Scope	These policies and procedures are for all National Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.

Procedures

Pricing Procedures

The Company utilizes rate manuals and online calculators, as appropriate to ensure correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements.

Employees are aware of contractual and statutory rate and pricing requirements. Title insurance policy premiums, state specific fees and endorsements are calculated in accordance with the title insurance underwriter or regulatory or promulgated rate manual through The Company's software and/or through the use of title insurance underwriter rate calculators.

When rate changes bulletins are received, the Office Manager will communicate these rate changes to the appropriate parties and will test the accuracy of such changes and report the results to Company Management.

Throughout the year a representative sample of closed files is subject to a post-closing review by the Accounting Department Manager to conclude if fees were correctly charged.

Recording Procedures

Submit or ship documents for recording to the county recorder, (or equivalent) or the person or entity responsible for recording within, 2 business days of settlement.

After review of county specific recording requirements documents are submitted for recordation by the Closer or Closing Department Assistant. When available and economically feasible, document recordation will be processed electronically via E-recording. When E-recordings cannot be utilized or are not available and when The Company does not utilize an employee, documents will be shipped for recording. The Company ships documents using UPS (United Parcel Service,) tracking all packages and maintains tracking information for 90 days.

Timely responses to recording rejections and verify recording is filed of record.

The Company maintains a Recording Log to monitor all recordings. After documents are sent for recordation, The Company maintains contact with the appropriate personnel and parties to resolve any problems. The Company updates the Recording Log with information about outstanding recordings and rejected recordings, status and resolution. After documents are recorded, detailed information such as book, page, instrument number, time and date are included in the transaction file. Each week the Closing Department Assistant reviews and signs off on the Recording Log.

Contact Officer

Kristen Forrester

Dated Approved	June 1, 2015
Date of Commencement	June 1, 2015
Amendment Dates	N/A
Date for Next Review	June 1, 2016

Related References and Links

- The Recording Log is kept on the Closing Department network in a folder labeled "Closing Department", in the "Recording" Sub Folder
- Rate Manuals are kept on the National Title Agency network drive in a folder entitled "Current Rate Information".
- Post-Closing Reviews are kept on the "Accounting Department" network drive in a folder entitled "Post Closing Reviews".



Policies and Procedures

Title Policy Production/ Premium Remittance

Purpose	Maintain written procedures related to title policy production, delivery, reporting and premium remittance to the insurer to ensure National Title Agency meets its legal and contractual obligations.
Scope	These policies and procedures are for all of National Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	Policy Inventory

The Company receives its policy inventory directly from the insurer via the electronic policy application. A Policy Inventory Report is available in the application to track and monitor all of the electronic policy numbers allocated to The Company.

The following items are included in the Policy Inventory report:

- The electronic policies are received by The Company
- The file number associated with each policy number
- Unused policies
- Voided policies
- Policy numbers assigned, but not yet reported to the insurer
- Policy issued, but not yet reported to the insurer

In addition to the Policy Inventory report, The Company has a tracking system that identifies files that have closed for which policies have not been issued.

Electronic policy stock is limited to authorized users with login and passwords.

Policy inventory duties have been clearly defined and are the responsibility of the Office Manager. We are able to reconcile our policy inventory records with the Insurer's records.

Policy Issuance

Policies are issued to customers (lender and/or purchaser) within 30 days after the transaction is disbursed. Electronic (or manual) logs (attached) are maintained within the software system to monitor all orders that have closed and disbursed in which final policies have not been issued.

If The Company does not perform that settlement/closing, the order is tracked and monitored by the Escrow Officer to ensure the documents are received 30 days after disbursement.

If a short-form lender's policy is issued, it can be delivered immediately after disbursement; however, monitoring procedures are still in place to ensure the necessary documents are recorded.

Premium Remittance and Policy Reporting

In accordance with contractual or statutory obligations on a monthly basis, The Company reports to the insurer all title insurance policies (including endorsements), premiums and other fees as contractually obligated. Reporting is performed using the attached policy register report that has been approved by the insurer or via electronic upload through the insurer's electronic report web-based system. Physical copies of the policies are emailed (or mailed) to the insurer.

A policy register report is maintained by each office that performs policy production.

Premium remittance duties have been clearly defined and are the responsibility of the Office Manager. We are able to reconcile the premiums and fees we charged to our customers with the premiums and fees remitted to the insurer.

Contact Officer Kristen Forrester

Date Approved June 1, 2015

Date of Commencement June 1, 2015

Amendment Dates N/A

Date for Next Review July 1, 2015

Related References and Links

- The Policy Inventory Register report is in our underwriter's electronic policy application.
- The Policy Tracking report is in our title production software application.



Policies and Procedures

Professional Liability Insurance

Purpose	Document procedures for review of professional liability coverage (errors and omissions insurance, fidelity and surety bond) and so that National Title Agency has financial capacity to cover its professional services obligations.
Scope	These policies and procedures are for all National Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	The Company is required, in accordance with New Jersey and Pennsylvania Law to carry and maintain errors and omissions as well as surety bond for transactions that do not have title insurance. The Administrative Assistant is responsible for tracking and the President & CEO is responsible for renewing all

insurance coverages. The Company furnishes copies of all the insurance policies and applicable bonds to their title underwriter(s), including all endorsements, and proof of payment of the current premium.

Professional Liability Insurance Coverage- Errors and Omissions

The Company carries professional liability insurance for errors and omissions in accordance with The Company's contractual obligations in the amount of \$1,000,000 per occurrence with a \$1,000,000 aggregate limit issued by Westchester Fire Insurance Company, a company acceptable to our title insurance underwriter. This comprehensive liability policy has a deductible of no more than \$5,000 per loss. A copy of most current policy is attached.

Fidelity Bond Coverage

Fidelity coverage is not required by state law or contractual obligation.

When requested by the customer or required by state regulation, the Company will issue an insurer's Closing Protection Letter (CPL) in connection with the settlement funds and issuance of a title insurance policy. This CPL will be issued via the insurer's automated Closing Protection Letter system. When required by state regulation the Company will set aside funds in a statutory indemnity fund to cover fidelity losses not otherwise covered by the protections afforded by the insurer.

Surety Bond Coverage

Surety bond coverage is required by Pennsylvania for escrows in real property transactions not involving the issuance of title insurance. The Company carries surety coverage of \$100,000 executed by Travelers Casualty and Surety Company of America. A copy of the most current bond is attached.

Cyber Liability Coverage

Cyber and privacy policies cover a business' liability for a data breach in which the firm's customers' personal information, such as Social Security or credit card numbers, is exposed or stolen by a hacker or other criminal who has gained access to the firm's electronic network. The policies cover a variety of expenses associated with data breaches, including: notification costs, credit monitoring, costs to defend claims by state regulators, fines and penalties, and loss resulting from identity theft.

Also the policies cover liability arising from website media content, as well as property exposures from: business interruption, data loss/destruction, computer fraud, funds transfer loss, and cyber extortion.

Contact Officer

Lou Forrester, President & CEO

Date Approved June 1, 2015
Date of Commencement June 1, 2015
Amendment Dates N/A
Date for Next Review June 1, 2016

Related References and Links

- Insurance information is kept on the National Title Agency network drive in a folder entitled "Insurance".
- Policy copies are attached.



Policies and Procedures

Consumer Complaints

Purpose To establish a process for receiving and addressing consumer complaints to ensure that National Title Agency addresses any instances of poor service or non-compliance.

Scope These policies and procedures are for all of National Title Agency (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.

Procedures **Maintain a standard consumer complaint form that identifies information that connects the complaint to a specific transaction.**

The Company has a standard consumer complaint form (attached) and uses this to record any/all consumer complaints. As circumstances warrant, supporting documents are attached to the complaint form which provide additional information including communications, facts or specific details. Management documents approval on completed consumer complaint forms.

Single point of contact for consumer complaints and process for routing consumer complaints to appropriate personnel.

The Office Manager is the single point of contact and the President & CEO is the back-up at The Company for consumer complaints. The nature of the complaint determines to which appropriate personnel the complaint will be forwarded, if necessary.

Log of consumer complaints that includes whether and how the complaint was resolved.

The Company maintains a Consumer Complaint Log (attached) with information on all consumer complaints and their status. Company Management will periodically review, date and sign-off on the Consumer Complaint Log.

Contact Officer Lou Forrester, President & CEO

Date Approved June 1, 2015

Date of Commencement June 1, 2015

Amendment Dates N/A

Date for Next Review June 1, 2016

Related References and Links

- *The Consumer Complain Form is kept on the H drive in the personal documents folders of the Administrative Assistant and the President/CEO in a folder entitled "Consumer Complaints".*
- *The Consumer Complaint Log is kept on the H drive in that personal documents folders of the Administrative Assistant and the President/CEO in a folder entitled "Consumer Complaints".*



Consumer Complaint Form

Please complete appropriate section(s) below, then "save as" using the following format:

"Last Name Consumer Complaint MMDDYY" and email to lf@nationaltitle.net

File Name Example: Smith Consumer Complaint 04-01-15

Date of Inquiry:

Consumer Contact Information:

Property Address (Street, City, State, Zip)

Contact address (If different from Property Address)

Contact Phone Number:

Additional Contact Phone Number:

Transaction Information:

Agent File Number:

Policy Number:

Property Type (Residential or Commercial):

Transaction Type (Purchase, Refi, REO, etc.):

Briefly describe the nature of the consumer's inquiry including dates of any conversations, phone calls, and names (including title and company affiliation) of those with whom consumer has spoken.

Indicate whether additional information or documentation is attached under separate cover.

Advice consumer that this will be routed to:

Kristen Forrester, Office Manager

Name/Title of person completing form:

Kristen Forrester, Office Manager

Management Review Name/Title:

Louis Forrester, President/CEO