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Consumer Privacy Policy Manual

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Chapter 1 Introduction

Community Development Corporation of Brownsville is committed to the highest standards of federal consumer compliance and requires all management, employees, and third-party vendors follow these policies and adhere to these standards.

1.1 Goals and Objectives

The standards set out in this policy represent minimum requirements based on applicable legal and regulatory guidance and apply throughout Community Development Corporation of Brownsville. These requirements are intended to prevent Community Development Corporation of Brownsville, our employees, and third-party vendors from violating federal regulations related to mortgage banking and consumer compliance with respect to consumer privacy.

1.2 Required Review

Community Development Corporation of Brownsville requires this policy be reviewed no less than annually.

The review shall include the compliance of this policy with current law, regulation or directive, the procedural implementation of this policy within the then current scope of Community Development Corporation of Brownsville business lines and operations, internal or external audit results received during the previous year, and then current industry trends or regulatory guidance.

1.3 Applicability

The purpose of this policy is to implement consumer protection mechanisms as required by the United States statutes and related regulations administered by the Consumer Financial Protection Bureau (CFPB) and other prudent regulators.

Wherever state or local regulations overlap and are stricter than the requirements set out in this policy, the more conservative approach shall be applied. If any applicable laws are in conflict with this policy, Community Development Corporation of Brownsville must consult with the appropriate legal counsel to resolve the conflict and to set forth Community Development Corporation of Brownsville's policies and procedures for compliance.

Chapter 2 Staff and Training

Community Development Corporation of Brownsville requires initial and ongoing training for all management and staff concerning this policy, other related policies, and underlying law and regulation.

Training may be conducted in a variety of settings utilizing any established education modality.

Regardless of the method of training delivery, all training must include the following requirements:

- Presentation of the subject material oriented for the adult learner
- An assessment of the learner to validate command of the subject matter with a minimum passing grade of 70%
- A completion certificate documenting satisfactory completion of all of the above

Community Development Corporation of Brownsville shall maintain adequate records of this training program to include the following:

- A description of all training programs
- Evidence of attendance and satisfactory completion for each employee subject to this policy
- Management response relative to additional training, reassignment, or other responses for those employees who may not have achieved a passing grade on the assessment and/or were not issued a completion certificate

2.1 Ongoing Training

All Community Development Corporation of Brownsville employees shall receive training to ensure current knowledge of this policy and the underlying federal regulations, to a degree commensurate with their job function, which may impact Community Development Corporation of Brownsville and the current state of law, regulation, and industry best practice.

At a minimum, training should include the following requirements as covered in this policy:

- Community Development Corporation of Brownsville 's policies and any changes within the last year
- The law and regulation underlying this and other policies including, but not limited to, the following:
 - Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010
 - Fair Credit Reporting Act
 - Gramm-Leach-Bliley Act (GLBA, Privacy of Consumer Financial Information (Regulation P)

- Community Development Corporation of Brownsville security protocols
- The implementation of Community Development Corporation of Brownsville’s policies and the practical application thereof in the context of the employee’s function or responsibility
- Disciplinary consequences up to and including termination for noncompliance

2.2 New Hire Training

New hire employees shall receive the above training as soon as is practicable but in no event later than four weeks of commencing employment with Community Development Corporation of Brownsville .

Chapter 3 Privacy of Consumer Financial Information (Regulation P)

3.1 Consumer Financial Protection Bureau

Community Development Corporation of Brownsville shall comply with Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) which transferred rulemaking authority of most provisions of Subtitle A of Title V of the Gramm-Leach-Bliley Act (GLB Act) to the Consumer Financial Protection Bureau (CFPB). Under Regulation P, Community Development Corporation of Brownsville must provide the following information:

- Provide notice to customers about its privacy policies and practices.
- Describe the conditions under which Community Development Corporation of Brownsville may disclose nonpublic personal information about consumers to nonaffiliated third parties.
- Provide a method for consumers to prevent Community Development Corporation of Brownsville from disclosing that information to most nonaffiliated third parties by “opting out” of that disclosure.

3.2 Definitions

The following definitions, as provided in Regulation P, are used in this policy:

Affiliate

Any company that controls, is controlled by, or is under common control with another company.

Company

Any corporation, limited liability company, business trust, general or limited partnership, association, or similar organization.

Consumer

An individual who obtains or has obtained a financial product or service from Community Development Corporation of Brownsville that is to be used primarily for personal, family, or household purposes, or that individual’s legal representative.

Continuing Relationship

A relationship between Community Development Corporation of Brownsville and a consumer wherein the consumer has an account with Community Development Corporation of Brownsville,

obtains a loan from or has a loan serviced by Community Development Corporation of Brownsville, enters into an agreement with Community Development Corporation of Brownsville to arrange a mortgage loan, or other types of financial relationships as described in Regulation P. Isolated transactions such as a consumer using an ATM, purchasing a money order, or making a wire transfer through Community Development Corporation of Brownsville do not constitute a “continuing relationship.” Continuing relationship does not exist if Community Development Corporation of Brownsville sells the consumer’s loan without retaining servicing rights.

Customer

A consumer who has a customer relationship with Community Development Corporation of Brownsville.

Customer Relationship

A continuing relationship between a consumer and Community Development Corporation of Brownsville under which Community Development Corporation of Brownsville provides one or more financial products or services to the consumer that are to be used primarily for personal, family, or household purposes.

Joint Agreement

A written contract under which Community Development Corporation of Brownsville and one or more other financial institutions jointly offer financial products or services.

Nonaffiliated Third Party, Nonaffiliate

Any person except an affiliate, or a person employed jointly by Community Development Corporation of Brownsville and any company that is not an affiliate.

Nonpublic Personal Information (NPI)

Personally identifiable financial information, and any list, description, or other grouping of consumers that is derived using any personally identifiable financial information that is not publicly available.

3.3 Initial Privacy Notice to Customers and Consumers

Community Development Corporation of Brownsville must provide a clear and conspicuous notice that accurately reflects Community Development Corporation of Brownsville’s privacy policies and practices to the following audience:

- *Customer.* An individual who becomes a Community Development Corporation of Brownsville customer, no later than when Community Development Corporation of Brownsville establishes a customer relationship, except as provided by the regulation.
- *Consumer.* A consumer, before Community Development Corporation of Brownsville discloses any nonpublic personal information about the consumer to any nonaffiliated third party, if Community Development Corporation of Brownsville makes such a disclosure other than as authorized by the regulation.

Community Development Corporation of Brownsville is not required to provide an initial notice to a consumer under the following circumstances:

- Community Development Corporation of Brownsville does not disclose any nonpublic personal information about the consumer to any nonaffiliated third party.
- Community Development Corporation of Brownsville does not have a customer relationship with the consumer.

Community Development Corporation of Brownsville establishes a customer relationship with a consumer when it originates or acquires the servicing rights to a loan to the consumer for personal, family, or household purposes. If Community Development Corporation of Brownsville subsequently transfers the servicing rights to that loan to another financial institution, the customer relationship transfers with the servicing rights.

3.4 Annual Privacy Notice to Customers Required

Community Development Corporation of Brownsville must provide a clear and conspicuous notice to customers that accurately reflects Community Development Corporation of Brownsville's privacy policies and practices not less than annually during the continuation of the customer relationship. *Annually* means at least once in any period of 12 consecutive months during which that relationship exists. Community Development Corporation of Brownsville may define the 12-consecutive-month period, but Community Development Corporation of Brownsville must apply it to the customer on a consistent basis.

Community Development Corporation of Brownsville must provide a notice annually if Community Development Corporation of Brownsville defines the 12-consecutive-month period as a calendar year and provide the annual notice to the customer once in each calendar year following the calendar year in which Community Development Corporation of Brownsville provided the initial notice. For example,

if a customer opens an account on any day of year 1, Community Development Corporation of Brownsville must provide an annual notice to that customer by December 31 of year 2.

Community Development Corporation of Brownsville is not required to provide an annual notice to a former customer.

3.5 Information to be Included in Privacy Notices

Community Development Corporation of Brownsville shall provide the required initial, annual, and revised privacy notices and must include the following items of information:

- The categories of nonpublic personal information that Community Development Corporation of Brownsville collects.
- The categories of nonpublic personal information that Community Development Corporation of Brownsville discloses.
- The categories of affiliated and nonaffiliated third parties to whom Community Development Corporation of Brownsville discloses nonpublic personal information, other than those parties to whom Community Development Corporation of Brownsville discloses information.
- The categories of nonpublic personal information about Community Development Corporation of Brownsville's former customers that Community Development Corporation of Brownsville discloses and the categories of affiliated and nonaffiliated third parties to whom Community Development Corporation of Brownsville discloses nonpublic personal information about its former customers. If Community Development Corporation of Brownsville discloses nonpublic personal information to a nonaffiliated third party and no other exception in the regulation applies to that disclosure, a separate statement of the categories of information it discloses and the categories of third parties with whom Community Development Corporation of Brownsville have contracted must be included in the initial, annual, and revised privacy notices.
- An explanation of the consumer's rights to opt out of the disclosure of nonpublic personal information to nonaffiliated third parties, including the methods by which the consumer may exercise that right at that time. The opt-out requirements do not apply if nonpublic personal information is provided to a nonaffiliated third party to perform services for Community Development Corporation of Brownsville or functions on its behalf, if the following applies: (i) The initial notice is provided in accordance with the law; and (ii) A contractual agreement has been entered into with the third party that prohibits the third party from disclosing or using the information other than to carry out the purposes for which Community Development Corporation

of Brownsville disclosed the information, in the ordinary course of business to carry out those purposes.

- Any disclosures that Community Development Corporation of Brownsville is required to make under the Fair Credit Reporting Act (e.g., notices regarding the ability to opt out of disclosures of information among affiliates).
- Community Development Corporation of Brownsville’s policies and practices with respect to protecting the confidentiality and security of nonpublic personal information.

When Community Development Corporation of Brownsville discloses nonpublic personal information to third parties as authorized under the regulation, Community Development Corporation of Brownsville is not required to list those exceptions in the initial or annual privacy notices. When describing the categories with respect to those parties, it is sufficient to state that Community Development Corporation of Brownsville makes disclosures to other nonaffiliated companies for its everyday business purposes, to process transactions, maintain accounts, respond to court orders and legal investigations, or report to credit bureaus; or as permitted by law.

3.6 Form of Opt-Out Notices and Opt-Out Methods

If Community Development Corporation of Brownsville is required to provide an opt-out notice, Community Development Corporation of Brownsville must provide a clear and conspicuous notice to each of Community Development Corporation of Brownsville’s consumers that accurately explains the right to opt out under that section. The notice must include the following information:

- That Community Development Corporation of Brownsville discloses or reserves the right to disclose nonpublic personal information about Community Development Corporation of Brownsville’s consumer to a nonaffiliated third party
- That the consumer has the right to opt out of that disclosure
- A reasonable means by which the consumer may exercise the opt-out right

Refer to the [Appendix](#) for model forms.

3.7 Revised Privacy Notices

Community Development Corporation of Brownsville must not, directly or indirectly through any affiliate, disclose any nonpublic personal information about a consumer to a nonaffiliated third party

other than as described in the initial notice that Community Development Corporation of Brownsville provided to that consumer. The exceptions to this requirement listed below are the only circumstances which would allow the sharing of information:

- Community Development Corporation of Brownsville has provided the consumer a clear and conspicuous revised notice that accurately describes Community Development Corporation of Brownsville's policies and practices.
- Community Development Corporation of Brownsville has provided the consumer with a new opt-out notice.
- Community Development Corporation of Brownsville has given the consumer a reasonable opportunity to opt out of the disclosure, before disclosing the information to the nonaffiliated third party.
- The consumer does not opt out.

3.8 Delivering Privacy and Opt-Out Notices

Community Development Corporation of Brownsville must provide any required privacy notices and opt-out notices, including any short-form initial notices, so that each consumer can reasonably be expected to receive actual notice in writing or, if the consumer agrees, electronically.

Community Development Corporation of Brownsville may reasonably expect that a consumer will receive the actual notice if Community Development Corporation of Brownsville either

- hand delivers a printed copy of the notice to the consumer;
- mails a printed copy of the notice to the last known address of the consumer; or
- clearly and conspicuously posts the privacy notice on Community Development Corporation of Brownsville's website and requires the consumer to acknowledge receipt of the notice as a necessary step to obtaining a particular financial product or service for those consumers who conduct transactions electronically.

For Community Development Corporation of Brownsville's customers, the initial notice (as well as the annual notice and any revised notice) must be provided so that the customer is able to retain or subsequently access the notice. A written notice satisfies this requirement.

3.8.1 Electronic Delivery of Privacy and Opt-Out Notices

In order to comply with the Electronic Signatures in Global and National Commerce Act (E-Sign Act), before obtaining a customer's consent to receive electronic delivery of documents that are required by

law, Community Development Corporation of Brownsville must provide, in a clear and conspicuous statement, the notification of the consumer's right or option to have the record provided or made available on paper or in a non-electronic format. The statement must contain the following information:

- The right to withdraw consent, including any conditions, consequences, and fees in the event of a withdrawal
- Whether the consent applies only to the particular transaction that triggered the disclosure or to identified categories of records that may be provided during the course of the relationship with Community Development Corporation of Brownsville
- A description of the procedures the consumer must use to withdraw consent and to update information needed to contact the consumer electronically
- Information about how the consumer may request a paper copy of a record and whether any fee will be charged for that copy

The consumer must be provided with a statement of the hardware and software requirements for access to and retention of electronic records.

If the consumer consents electronically, or confirms his or her consent electronically, it must be in a manner that reasonably demonstrates the consumer can access information in electronic form that will be used to provide the information that the consent relates to.

If a change in the hardware or software requirements needed to access or retain electronic records creates a material risk that the consumer will not be able to access or retain subsequent electronic records subject to the consent, Community Development Corporation of Brownsville must provide the consumer with a statement of (a) the revised hardware and software requirements for access to and retention of electronic records, and (b) the right to withdraw consent without the imposition of any condition, consequence, or fee for such withdrawal. If a technological change or upgrade in electronic recordkeeping creates the risk that the consumer will no longer be able to access records, the consumer must be notified of the change and reminded of the right to withdraw.

For customers who obtain financial products or services electronically, and agree to receive their notices on the institution's website, Community Development Corporation of Brownsville may provide the current version of its privacy notice on its website.

3.8.2 Alternative Method for Providing Annual Notices

Community Development Corporation of Brownsville is going to use the following alternative method to satisfy the annual notice requirement by performing all of the following:

- Post Community Development Corporation of Brownsville’s current privacy notice continuously and in a clear and conspicuous manner on a page of Community Development Corporation of Brownsville’s website on which the only content is the privacy notice, without requiring the customer to provide any information such as a login name or password or agree to any conditions to access the page.
- Mail Community Development Corporation of Brownsville’s current privacy notice to those customers who request it by telephone within 10 days of the request.

3.9 Exceptions

The following exceptions apply, as described in Regulation P.

3.9.1 Exceptions for Service Providers and Joint Marketing

The opt-out requirements do not apply when Community Development Corporation of Brownsville provides nonpublic personal information to a nonaffiliated third party to perform services for or on behalf of Community Development Corporation of Brownsville under the following conditions:

- The initial notice was provided in accordance with Regulation P.
- Community Development Corporation of Brownsville has a contractual agreement with a third party that prohibits the third party from disclosing or using the information other than in the ordinary course of business carried under the terms of the agreement.

The services performed by a nonaffiliated third party may include marketing of Community Development Corporation of Brownsville’s products or services or marketing of financial products or services offered pursuant to joint agreements between Community Development Corporation of Brownsville and one or more financial institutions.

3.9.2 Exceptions for Processing and Servicing Transactions

The requirements for the opt-out do not apply if Community Development Corporation of Brownsville discloses nonpublic personal information as necessary to effect, administer, or enforce a transaction that a consumer requests or authorizes, or in connection with any of the following:

- Servicing or processing a product or service that was requested or authorized by the consumer
- A proposed or actual securitization, secondary marketing sale, sale of servicing rights, or similar transaction.

3.9.3 Other Exceptions

The requirements for initial notice, for the opt-out, and for service providers and joint marketing do not apply when Community Development Corporation of Brownsville discloses nonpublic personal information in accordance with any of the following:

- With the consent or direction of the consumer (provided the consumer has not revoked consent)
- To safeguard the confidentiality of Community Development Corporation of Brownsville's records pertaining to the consumer or transaction, such as for risk control or resolving disputes
- To provide information to advisory or rating agencies; persons who are assessing Community Development Corporation of Brownsville's industry compliance; or Community Development Corporation of Brownsville's attorneys, accountants or auditors.
- To provide information to law enforcement agencies, state insurance authorities, self-regulatory agencies, or for an investigation pertaining to public safety, to the extent permitted by law
- To provide information to a consumer reporting agency, in accordance with the Fair Credit Reporting Act
- To comply with federal, state, or local laws or other legal requirements

3.9.4 Exceptions for Annual Notice

The requirements for providing annual notice will not apply to Community Development Corporation of Brownsville for disclosure of nonpublic personal information under the terms of subsections 6802(b)(2) Opt Out or 6802(e) General Exceptions in GLBA provided Community Development Corporation of Brownsville has not changed its policies and procedures from those most recently disclosed to consumers. This exception is granted under Section 75001 of the Fixing America's Surface Transportation Act (FAST Act), which amended Section 6803 of the Gramm-Leach-Bliley Act (GLBA). However, Section 75001 does not affect the GLBA/Regulation P content and delivery requirements where Community Development Corporation of Brownsville would still be required to provide annual notice of the company's privacy policies and practices to customers.

Chapter 4 Consumer Privacy Disclosure Requirements

Community Development Corporation of Brownsville requires all employees, affiliates, and service providers to comply with Regulation P regarding the disclosure of their privacy policies and practices. Disclosures must contain language with respect to information sharing with third parties on financial products for personal, family, and household purposes. The disclosure applies to all consumers who apply for a financial product, regardless of whether the credit is extended by Community Development Corporation of Brownsville. Community Development Corporation of Brownsville's policy pertains to web-based, telephone, or written mortgage applications. Community Development Corporation of Brownsville, its employees, affiliates, and third-party providers are required to comply with Regulation P for information sharing with any of the following:

- Credit agencies
- Appraisers
- Designated underwriters
- Mortgage insurance companies
- Mortgage investors
- Document preparation companies
- Closing agents
- Electronic business-to-business portals
- Outsource quality control firms

The privacy notice must contain language to inform the customer that personal information will not be shared with third parties and must be given to the borrower when the loan application is taken.

Chapter 5 Safeguarding Confidential Information

Employees may have access to confidential information about Community Development Corporation of Brownsville's customers, other employees, and clients. All loan originators, processors, and other staff members referencing file documents from former customers for the purposes of evaluation and processing an application shall adhere to the policies set forth regarding use and reuse of consumer information and information sharing.

CDCB uses distributed data storage, meaning a customer list will be separate from any personal information which will be separate from any loan or transaction data. Combination and the storage of combined data is forbidden and only during a process to secure software will have a transaction file.

For direct marketing prior customers (they are approached by a representative of Community Development Corporation of Brownsville) the consumer may be unaware of what information, and the extent of information, that has been made available to Community Development Corporation of Brownsville's representative, who may be a different loan originator. In these cases, caution must be exercised to assure the customer that access to their information was duly authorized and in compliance with privacy regulations. A general policy for safeguarding consumer information is to mark all e-mails and correspondence with "Confidential." For purposes of this policy, confidential information includes, but is not limited to, the following:

- Information regarding personnel who are currently or formerly employed by Community Development Corporation of Brownsville
- Procedures for computer access and passwords of Community Development Corporation of Brownsville employees and system users. All 3 storage systems will require different passwords and tracked access with audit trails.
- Any information pertaining to mortgage borrowers who have applied for credit with Community Development Corporation of Brownsville
- Prospect information concerning potential customers of Community Development Corporation of Brownsville
- Any other information relating to Community Development Corporation of Brownsville's research, marketing, operations, investors, warehouse lenders, and secondary marketing agencies

The [Safeguards Rule](#), issued by the Federal Trade Commission as part of the implementation of the Gramm-Leach-Bliley Act, requires that Community Development Corporation of Brownsville develop a written information security plan that describes its program to protect customer information. In order to develop, implement, and maintain an appropriate information security program, Community Development Corporation of Brownsville must establish the following protocols:

- Identify reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of customer information that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such information, and assess the sufficiency of any safeguards in place to control these risks. At a minimum, such a risk assessment should include consideration of risks in each relevant area of Community Development Corporation of Brownsville’s operations, including
 - employee training and management;
 - information systems, including network and software design, as well as information processing, storage, transmission, and disposal;
 - detecting, preventing, and responding to attacks, intrusions, or other systems failures; and
 - access and security protocols for any physical work space used by Community Development Corporation of Brownsville.
- Design and implement information safeguards to control the risks identified through risk assessment, and regularly test or otherwise monitor the effectiveness of the safeguards’ key controls, systems, and procedures.
- Oversee service providers, by
 - taking reasonable steps to select and retain service providers that are capable of maintaining appropriate safeguards for the customer information at issue; and
 - requiring service providers by contract to implement and maintain such safeguards.
 - Should a lock down happen, all bank partners and authorities will be informed while Plexus will do an audit on the data and systems.
- Evaluate and adjust the information security program in light of the results of the testing and monitoring; due to any material changes to Community Development Corporation of Brownsville’s operations or business arrangements; or any other circumstances that Community Development Corporation of Brownsville knows or has reason to know may have a material impact on Community Development Corporation of Brownsville’s information security program.

5.1 Fannie Mae Requirements

Community Development Corporation of Brownsville must maintain a response program consistent with the requirements of the Interagency Guide on Response Programs for Unauthorized Access to

Customer Information and Customer Notice, as published in the Federal Register¹. Fannie Mae expects Community Development Corporation of Brownsville to “implement commercially reasonable measures to ensure the security, integrity, and confidentiality of Fannie Mae confidential information, including, but not limited to, the following:

- Industry-standard encryption
- Disaster recovery
- Secure disposition methods”²

¹ <https://www.federalregister.gov/documents/2005/03/29/05-5980/interagency-guidance-on-response-programs-for-unauthorized-access-to-customer-information-and>; Correction published as <https://www.federalregister.gov/documents/2006/02/03/06-1009/interagency-guidance-on-response-programs-for-unauthorized-access-to-customer-information-and>

² Bulletin 2017-01

5.1.1 Obligations for Data Breach Incidents

If Community Development Corporation of Brownsville, as a seller/servicer, experiences a data breach, the company must take the following actions under the terms of its Fannie Mae Master Agreement:

- Provide written notice to the borrowers and any state agencies or other bodies in accordance with privacy and data security breach laws.
- Maintain a copy of the notice in the individual mortgage loan file.
- Notify Fannie Mae's Privacy Office of any incident as soon as reasonably practicable via email to privacy_workinggroup@fanniemae.com. Notification must be within 72 hours if there is a data breach that
 - affects 10 or more borrowers;
 - requires notice to state agencies or other regulatory bodies designated by privacy and data security breach laws; or
 - involves the intentional unauthorized access or misuse of borrower nonpublic personal information (NPI).
- Request permission from Fannie Mae's Privacy Office to use Fannie Mae's name if Community Development Corporation of Brownsville intends to refer to Fannie Mae in any notices sent to affected borrowers or regulatory agencies.
- Fully cooperate with Fannie Mae to enable compliance with its legal and privacy incident management obligations.

Community Development Corporation of Brownsville's notification of a data breach to Fannie Mae's Privacy Office must include the following information:

- A detailed description of the scope of the incident, including the number of impacted individuals and states where they reside.
- A description of the related NPI.
- The root cause (if known).
- The response plan.
- A copy of the breach notice that Community Development Corporation of Brownsville plans to send to borrowers or an explanation as to why it is not sending a breach notice.

Chapter 6 Prohibited Activities

Employees are prohibited from using Community Development Corporation of Brownsville's e-mail system, network, or Internet/Intranet access for the following activities:

- Downloading software without the prior written approval from Community Development Corporation of Brownsville
- Printing or distributing Community Development Corporation of Brownsville's or any other copyrighted materials including, but not limited to, software, articles, and graphics protected by copyright
- Using software that is not licensed by the manufacturer or approved by Community Development Corporation of Brownsville
- Sending, printing, or otherwise disseminating Community Development Corporation of Brownsville's proprietary data, or any other information deemed confidential by Community Development Corporation of Brownsville to unauthorized persons
- Operating a business or otherwise engaging in commercial activity outside the scope of employment unless prior permission to do so is obtained
- Sending or forwarding messages containing a consumer's credit or confidential information or account numbers
- Sending or forwarding a message that discloses personal information without Community Development Corporation of Brownsville's authorization including accessing, transmitting, receiving, or seeking confidential information about borrowers or mortgage transactions without authorization
- Using another employee's password or impersonating another person while communicating or accessing Community Development Corporation of Brownsville's network or the Internet
- No local storage of data

Chapter 7 Authorized Use of Software

Community Development Corporation of Brownsville regularly purchases, leases, or maintains site licenses for computer software applications from a variety of commercial manufacturers. To ensure compliance with software license agreements and Community Development Corporation of Brownsville's Information Security Policy, employees must adhere to the following:

- Employees must use software in accordance with the manufacturer's license agreements and Community Development Corporation of Brownsville's policy. Employees acknowledge they do not own software or its related documentation. Employees may not make additional copies of software, unless expressly authorized by the software publisher.
- Any employee who knowingly makes, acquires, or uses unauthorized copies of computer software licensed to Community Development Corporation of Brownsville, or who places or uses unauthorized software on Community Development Corporation of Brownsville's premises or equipment shall be subject to disciplinary action or termination.
- Employees must obtain permission from Community Development Corporation of Brownsville prior to installing personal software onto Community Development Corporation of Brownsville computer system. Employees are not permitted to copy software from Community Development Corporation of Brownsville computer system for installation on home or other computers without prior authorization.
- In cases that require an employee to use software at home, Community Development Corporation of Brownsville will purchase an additional copy or license. Employee acknowledges that any additional copies or licenses purchased for home use are the property of Community Development Corporation of Brownsville. Employees who are required to use software at home should consult with the operations manager or systems administrator to determine if appropriate licenses allow for home use.
- Employees who suspect or become aware of software misuse are required to notify Community Development Corporation of Brownsville.

Chapter 8 Administrative Access Control

The Associate for Research Development and/or the Executive Assistant shall maintain confidential passwords and access codes for technology on a corporate-wide level. The bank's president and members of the security committee may have copies of access code information. Access to information systems should be granted to employees on a need-to-know basis. Changes in personnel, job responsibilities, termination, or extended leave shall warrant changes in passwords or system access. E-mail accounts and other systems access for individuals who leave the employment of Community Development Corporation of Brownsville must be disabled within 24 hours of departure. Community Development Corporation of Brownsville is utilizing Google for hosting emails with the CDCB.ORG domain.

Password policies will be enforced and penalties listed for non compliance.

Chapter 9 Firewall Procedures

This policy guide includes a systemized plan for design and maintenance of firewalls in Community Development Corporation of Brownsville computer systems. The firewall policy serves as a variable component of Community Development Corporation of Brownsville overall security policy, depending on the extent of Internet access by its employees. The firewall policy and implementation must cover each of the following elements:

- Ensure the system is able to examine information content.
- Ensure that logging functionality is consistent with access controls.
- Support advanced user authentication.
- Detect intrusions.
- Respond to intrusions.
- Cover domain name, HTTP, SMTP, DNS, and IP traffic.
- Cover all levels of firewall protection, such as the following:
 - Packet filtering
 - Proxy services
 - Application-level firewalls
 - Community Development Corporation of Brownsville uses a Linksys E2500 Router/Firewall with 128-bit WEP encryption algorithm with IPv6 and IPv4 SPI Firewall protection enabled.
- All databases will be daily audited for strange access patterns and locked down in case of suspected or possible breach.
- Periodic penetration testing and phishing tests will be conducted.

Chapter 10 Data Center Security

The area in which the information systems components are located must have controlled access. The site should be monitored for exposure from fire, flood, and environmental hazards. Windows and doors must be secure and the location should not be identified by signage. Detection devices should be used where applicable to prevent theft and safeguard equipment.

Community Development Corporation of Brownsville must develop and enforce a “clean desk” policy to prevent unauthorized individuals from accessing confidential information of customers at all times. It is imperative that desks, conference tables, fax machines, and photocopying centers be cleared of confidential documents and information at the end of each day to avoid exposure. Community Development Corporation of Brownsville has one Windows 2012r2 server that is protected by AVG Business Internet Security. All Data on the server is backed up to the cloud using MozyPro Client. Backups are performed every night at 3am central standard time. Applications installed locally include Load Ledger and Calyx. All other software is cloud-based and hosted by 3rd parties.

Chapter 11 Document Destruction

Credit reports, mortgage applications, financial statements, tax returns, paystubs, W-2 forms, retirement income documentation, any other documents that contain the customer's Social Security number, names of financial institutions, and account numbers must be destroyed once the record retention date has passed using one of the following methods:

- Commercially built mechanical shredder
- On-site services provided by shredding service company

Wrinkling of documents, tearing into sections, and disposing into the office trash any documents containing confidential or financial information is a violation of this policy. Any documents containing confidential or financial information must be disposed of by one of the methods stated above. Any documents that are removed from the office for the purpose of at-home work must be kept in a safe, secure area during travel and at the off-site location. Any lost or misplaced confidential documents or computer equipment containing confidential information must be reported to the compliance officer immediately.

Any employee, representative, or affiliate of Community Development Corporation of Brownsville found disposing of any confidential or financial documents including, but not limited to, credit reports or any income, asset, liability information of consumers in any outside or publicly accessible area shall be grounds for disciplinary action, including termination.

Chapter 12 Model Form

FACTS**What Does Community Development Corporation Do With Your Personal Information?**

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also required us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Community Development Corporation chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information		Can you limit this sharing?
For our everyday business purposes -- such as to process your transactions, maintain your account(s), responds to court orders and legal investigations, or report to credit bureaus		
For our marketing purposes -- to offer our products and services to you		
For joint marketing with other financial companies		
For our affiliates' everyday business purposes -- information about your transactions and experiences		
For our affiliates' everyday business purposes -- information about your creditworthiness		
For our affiliates to market to you		
For nonaffiliates to market to you		

Questions?	
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Who we are	
Who is providing this notice?	
What we do	
	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
	We collect your personal information, for example, when you
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes - information about your creditworthiness • affiliates from using your information to market to you • sharing for non-affiliates to market to you <p>State Laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.