



## Privacy Policy for Master Policyholders

### 1.0 STATEMENT OF PURPOSE

**Essent US Holdings, Inc.**, and its U.S. affiliates, (collectively referred to as “Essent”), is committed to complying with applicable information privacy and security laws. Essent has prepared this Privacy Policy (the “Policy”) in order to explain how it collects, uses and protects Private Information it obtains about consumers in the course of providing products and services to its customers and to consumers where applicable.

### 2.0 SCOPE OF THIS POLICY

This Policy applies to information that Essent collects that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Private Information”), whether Essent obtains the information directly from the consumer or from one of Essent’s commercial customers (“Customer”), or otherwise obtains such information in the normal course of Essent’s provision of financial products or services (“Services”) to its Customers. This Policy is informed by and ensures compliance with the Gramm-Leach-Bliley Act (15 U.S.C. Section 6801, et seq.) and its implementing regulations, as well as applicable state and federal privacy laws in the U.S.

This Policy does not apply to information pertaining to employees of Essent or to any service provider or commercial entity.

This Policy is intended to govern all Essent directors, officers, employees, contractors, vendors, service providers, and any other person whom Essent authorizes to access such information, except where such access is pursuant to specific legal authority.

### 3.0 POLICY

#### A. Types Of Private Information Collected By Essent

- Essent only collects Private Information which is essential to the purposes for which it was collected including those listed under the heading “Reasons for Obtaining Private Information” below.
- Essent obtains Private Information concerning borrowers’ credit history, which may also include a credit score.
- Essent also obtains Private Information about consumers’ financial condition including existing account relationships, obligations and sources/amounts of income and assets.
- Essent also obtains identifying information such as social security/social insurance numbers, driver’s license numbers, addresses, phone numbers and any other relevant contact information.
- Essent must also obtain information concerning the location, character, and value of the property securing an insured loan, as well as information about the terms of the insured loan itself.
- In the event a claim is received, Essent may update all previously provided Private Information, as well as obtaining information relating to the circumstances of the default, and any information pertaining to a borrower’s personal bankruptcy filing or other legal proceedings involving the borrower or the property which secures the loan.
- Essent may also perform an investigation to ascertain whether any of the information relied on to insure a loan was misrepresented. This investigation may include personal interviews with the borrower, and other parties having knowledge of the borrower’s financial situation, the value and condition of the property, or the transaction itself.

Mortgage Insurance provided by Essent Guaranty, Inc.

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**ESSENT’S PRIVACY POLICY 01**



- From time to time, Essent may, but is not obligated to, offer credit counseling, debt management, default counseling, loss mitigation services, general information, promotional items or other services to consumers either directly or through a contractor or vendor. On such occasions, Essent or its agent may obtain Private Information directly from the consumer, relating to the consumer's identity, demographics, contact information, financial condition, creditworthiness and other attributes.
- Essent may, but is not obligated to, record or otherwise analyze telephone calls that Essent receives.

## B. Sources Of Private Information And Consent

- Requests for products and services from Essent which originate from a consumer's financial institution will normally involve the transfer of Private Information from the financial institution to Essent. In the course of providing services, Essent may have occasion to receive additional Private Information from third party sources, such as credit reporting agencies, investigators, attorneys, and other service providers, or from consumers themselves.
- Essent may also obtain Private Information online through its web sites or if consumers otherwise contact Essent, directly from consumers requesting promotional consideration, educational services and credit counseling services or referrals.
- When a consumer obtains a product or service through a financial institution, the financial institution the consumer is dealing with will obtain the consumer's consent to share information with its own third party vendors, including Essent. Such consent must be sufficient to allow Essent to collect, use and disclose Private Information in the manner contemplated by this Privacy Policy.
- If a consumer receives services directly through Essent or participates in promotions or counseling offered by Essent, the consumer's consent will be obtained for the collection, use and disclosure of Private Information at the time of collection, if not otherwise already obtained by Essent or the consumer's financial institution.
- Essent may retain Private Information in anonymized format after it is no longer needed to perform the service requested by the consumer and access it, temporarily re-identifying it, to improve the models used in our operations.

## C. Reasons For Obtaining Private Information

Essent will only collect, use and disclose Private Information for the following reasons in connection with providing the Services to its Customers or its own operational purposes:

- To determine a customer's eligibility for mortgage guaranty insurance and related products and administer and service such insurance and products;
- To control risk;
- To mitigate and recover losses and otherwise enforce Essent's rights;
- To evaluate and pay claims;
- To prevent or investigate fraud;
- To maintain and improve the services, including for quality assurance purposes;
- To perform or facilitate credit counseling, loan modification or loss mitigation services;
- To administer promotions which customers or consumers elect to participate in;
- To respond to requests for general information;
- To respond to government regulator requests for information;

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**ESSENT'S PRIVACY POLICY 02**



- As otherwise may be disclosed at the time of collection; and
- To provide any other services requested.

Essent will not retain, use, or disclose Private Information for any purpose other than for the specific purpose of performing the Services to its Customers, or as otherwise described herein or permitted by applicable law. Please note, Essent may use the Private Information to improve the models used in our operations.

#### D. How Essent Obtains Private Information

Essent obtains information from customers, consumers, contractors and vendors through any combination of the following:

- Electronic or magnetic transmission over email, dedicated computer/network systems, secure Internet connections, electronic media or other acceptable electronic means;
- Facsimile;
- Voice communications; or
- Hard copy form.

#### E. Disclosure Of Private Information By Essent

- Essent will only disclose Private Information to other parties as may be reasonably necessary in connection with the reasons for obtaining the Private Information described above or as otherwise required or permitted by law. This may include disclosures to service providers that help Essent provide the Services.
- Essent does not use or share Private Information in order to market products or services not requested by the Customer that owns the information.
- In the event Essent finds it necessary to share information with service providers, Essent will require such service provider to agree contractually to maintain the privacy and security of the information in a manner consistent with this Policy.
- When possible, Essent will encrypt or otherwise security transmit Private Information and require third parties transmitting Private Information to do the same.
- When possible, Private Information will be masked or otherwise de-identified prior to being disclosed to any third party.

#### F. Safeguarding Information

Essent will use a high degree of care to protect the availability, integrity and confidentiality of Private Information in its possession. Essent will ensure that physical, administrative and technical safeguards which are commensurate with the sensitivity of the Private Information it collects are implemented to protect against unauthorized or inadvertent collection, use and disclosure of such Private Information.

Essent will restrict access to Private Information to only those individuals who have a need-to-know the information in order to provide the Services or as necessary to operate Essent's business, unless otherwise required by law. Employees who have access to a consumer's Private Information are required to protect it and keep it private.

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## G. Location And Retention Of Private Information

Essent will generally maintain Private Information in the United States of America. Except as is required to provide the Services, fulfill legal/regulatory requirements, or as necessary to maintain the integrity of Essent's books and records, Private Information will generally be returned to a Customer or securely destroyed consistent with applicable law when it is no longer in use or needed for archival purposes. Notwithstanding the foregoing, Essent may retain Private Information in anonymized format for use in the improvement of models used in our operations.

## H. Notification In The Event Of Unauthorized Disclosure

In the event Essent discovers or has a reasonable belief that Private Information maintained by Essent has actually been compromised by an unauthorized individual, Essent will notify the Customer that owns the Private Information per applicable law(s). Such Customer, rather than Essent, is generally expected to notify their consumers of the suspected breach as required or appropriate.

## I. Administration Of Privacy Policy

Essent has appointed a committee of individuals representing a variety of areas of the company to administer its policies and procedures for handling Private Information.

Compliance with this Policy is the responsibility of every Essent employee. To that end, Essent provides notice to all employees of the contents of this Policy and provides regular periodic training to employees on how to comply with Essent's policies and with applicable law.

## J. Periodic Review Of Privacy Policy

In addition to periodic evaluation of its own policies and procedures, from time to time, Essent may engage the services of experts, including certified public accounting firms and consultants, to review Essent's policies, procedures and compliance with applicable law and its own policies and procedures. Deficiencies are reported to the Chief Compliance Officer and the Information Security Committee.

## K. Notice Of Essent's Privacy Policy, Access And Inquiries

Questions or complaints regarding Essent's Privacy Policy or practices should be directed to any of the following:

### **Chief Compliance Officer**

Essent Guaranty, Inc.  
Two Radnor Corporate Center  
100 Matsonford Road  
Radnor, PA 19087  
or by calling 877.569.6547

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**ESSENT'S PRIVACY POLICY 04**