



## **Thornburg Mortgage Privacy Policy**

The board, management and staff of Thornburg Mortgage Home Loans, Inc. ("we", "our" or "Thornburg Mortgage") highly value our customer and consumer relationships and are acutely aware of the trust and responsibilities these relationships entail. We are committed to offering our customers an attractive menu of financial products and services to help them meet their financial goals. In so doing, however, we are mindful of our obligation to ensure that the privacy of the sensitive personal and financial information entrusted to us is not compromised. This Privacy Policy is intended to allow the attainment of these objectives. If you are providing information through our website located at [www.thornburgmortgage.com](http://www.thornburgmortgage.com) (the "website"), you should also review our Online Privacy Policy.

### **Gathering Personal Information**

Thornburg Mortgage collects nonpublic, personally identifiable and financial information about you, the customer ("you," "your" or "customer") including: (i) information received from you on applications or other forms, such as when you fill out an application for a loan; (ii) information about your transactions with us, our affiliated companies, or other third parties; and (iii) information we receive from consumer reporting agencies.

The type of information that we request from you depends on the service that you are utilizing. For example, when you fill out an application, we may ask for information such as your name, address, income, employment, investments and other similar information. We also collect information from you when you use our website as further discussed in our Online Privacy Policy.

### **Use of Personal Information**

Although we may disclose all of the information we collect and retain, its use will be limited to what we reasonably believe is appropriate and necessary to administer our business and to provide the quality of service you expect and deserve, such as to: (i) conduct business with you and to protect and administer your records; (ii) satisfy regulatory reporting and other legal requirements; (iii) administer proper internal operations; and (iv) allow us to better understand your financial needs in order to design or improve our financial products and services.

### **Types of Information that Thornburg Mortgage Discloses**

Thornburg Mortgage is affiliated with a number of companies that work together to bring you the financial services and products that may benefit you. We do not share nonpublic

information with any persons, companies or organizations that are not affiliated with Thornburg Mortgage, except as permitted by law, as noted below. The nonpublic personal information we may share about our current and former customers with our affiliated companies is: (i) identification information, such as name, address and telephone number; (ii) transactional information; and (iii) loan account experience. By sharing this information, Thornburg Mortgage can better understand your financial needs. As a result, we can then send you notification of new products and services that you might not otherwise be aware of.

By law we may share nonpublic personal information about customers in the following circumstances:

- To effect, administer or enforce a transaction.
- If the transaction, service or product is requested or authorized by the customer.
- To maintain or service a customer's account as part of another loan extension program.
- In connection with a securitization, secondary market sale (including servicing rights), or similar transaction related to a consumer.
- For disclosures that are necessary to enforce Thornburg Mortgage's legal or contractual rights or the rights of any other person who is engaged in the financial transaction.
- For disclosures required in the ordinary course of business, such as the settlement of claims or benefits, the confirmation of information to the consumer or the consumer's agent, and the billing, processing, or clearing of items in the normal course of business.
- To provide information to insurance rating advisory organizations, guaranty funds or agencies, agencies that are rating Thornburg Mortgage, persons who are assessing Thornburg Mortgage's compliance with industry standards and Thornburg Mortgage's attorneys, accountants and auditors.
- To the extent permissible under the Right to Financial Privacy Act.
- To a consumer reporting agency under the Fair Credit Reporting Act (FCRA). Our Policies regarding FCRA are outlined below.
- To comply with federal, state or local laws, rules and other applicable legal requirements.

### **Safeguarding Customer Information**

At Thornburg Mortgage, we protect customer privacy by ensuring that only employees who have a business reason for knowing information have access to it.

Thornburg Mortgage maintains physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic, personal information. We continually assess new technology for protecting information. We continually strive to

ensure that our operational and data processing systems are in a secure environment that protects your account information from being accessed by unauthorized parties.

You can also take steps to help safeguard your personal information. Protect your account numbers, PIN and customer access numbers. Never disclose confidential information to unknown callers.

### **Accuracy of Information**

Thornburg Mortgage has established procedures to ensure that your financial information is accurate, current and complete, in keeping with reasonable industry standards. We continually strive to maintain complete and accurate information about you and your accounts. Should you believe our records contain inaccurate or incomplete information about you, notify us. We will investigate your concerns and correct any information we determine to be inaccurate.

### **Fair Credit Reporting Act Disclosure**

The Fair Credit Reporting Act sets standards that regulate the use of consumer reports. This Act permits us to share with our affiliates and non-affiliates information regarding transactions and experiences. While it also permits (with opt-out provisions) the sharing of information we obtain from third parties (consumer or credit reports for example), it is the policy of Thornburg Mortgage not to do so except where allowed by regulation or law. (See "Exceptions to Your Opt-Out Rights" above.)

If you have opted-out of the sharing agreements with companies outside of the Thornburg Mortgage family of companies referred to in this Privacy Policy, there is no need to do so for the purposes of the Fair Credit Reporting Act.

### **Former Customers**

Even if you are no longer a customer, our Privacy Policy, including our Online Privacy Policy, will continue to apply to you.

### **ONLINE PRIVACY POLICY**

Thornburg Mortgage's Privacy Policy explains how we use and share information about you as we provide financial products and services. However, because of the unique nature of online transactions, there is some additional information you should be aware of when you visit our website. This policy describes our online-specific Privacy Policy. Customers who conduct online activities are subject to both the Privacy Policy described before and this Online Privacy Policy. Capitalized terms not defined herein shall have the meanings set forth in the Privacy Policy.

### **Information We Collect Online**

When you use our website, we may collect personally identifiable information from you, such as your email address and your name and address, if you are submitting an online loan application.

## **Protection of Your Online Information**

Thornburg Mortgage is dedicated to the security of your personal information, and we take every commercially reasonable precaution to maintain that protection. To prevent unauthorized access or disclosure, maintain data accuracy and facilitate the appropriate use of information, we use physical, electronic and managerial procedures to attempt to protect the personal information we collect online. Encryption tools are used when collecting or transferring sensitive information, such as account numbers or credit card data.

### **Cookies**

We also collect information about you and your use of our site through the use of cookies. "Cookies" are small computer files that we transfer to your computer's hard drive that allow us to know how often someone visits our site and the activities they conduct while on our site. Cookies contain no personal information and are not used to monitor activity once you leave our website. This information helps us dynamically generate advertising and content on Web pages specifically designed for you and also allows us to statistically monitor the number of people using our site and for what purpose. Sponsors and advertisers may also use cookies when you select their advertisements and we do not control their use of cookies or how they manage the information they gather.

### **Choice**

Thornburg Mortgage believes that choice is one of the most important privacy principles. You have the choice not to submit any personally identifiable information to us (although under such circumstances you may not be able to use many of our online services). You also may choose to submit only those mandatory files of data absolutely required for registration on our website. Finally, you may choose to limit the use of, or access to, your personally identifiable information by, among other things, requesting or not requesting that we communicate Thornburg Mortgage product or service information to you. You may opt out of any such communications lists at any time simply by contacting us at 1-877-862-9280. Additionally, each email message we send you will clearly state how you may remove your name from the email list. Please note that you will not be able to opt out with regard to the collection and disclosure of aggregate information. Such information does not include anything personally identifiable, however, and simply reflects statistical analysis of various aspects of site usage.

### **Children**

Thornburg Mortgage does not specifically intend to collect information from children. We believe that children should have parental consent before giving out personal information. If you discover your child has used our website against your wishes, contact us at 888-898-8698 and we will remove your child's information from our records. If you are concerned about your child's use of our website, we encourage you to use website filtering technology to supervise your child's access to that site.

## **Retention of Information**

Once you have provided personal information to Thornburg Mortgage, we will store and maintain the information you have volunteered for so long as you have not directed us otherwise. Our retention of this data allows us to continue providing you with personalized services and appropriate products without interruption.

## **Changes to the Privacy Policies**

If we materially change the Privacy Policy, the Online Privacy Policy or practice by, for example, adding a category of information that we will disclose to a third party, we will notify existing customers and give them an appropriate time period to opt out of the disclosure.

## **Whom You Should Contact With Questions**

If you have any questions or concerns relating to the Privacy Policy or Online Privacy Policy, letters should be forwarded directly to:

Thornburg Mortgage Home Loans, Inc.  
Attn: Director of Privacy Policy  
150 Washington Avenue  
Santa Fe, New Mexico 87501

Or, you may email us at [privacy@thornburgmortgage.com](mailto:privacy@thornburgmortgage.com) or call 1-877-862-9280 and leave a message. We will normally respond to your emails and calls in the order received.

The board of directors of Thornburg Mortgage Home Loans, Inc. approved and adopted this policy on July 1, 2004.

## **Thornburg Mortgage Online Security Policy**

### **Thornburg Mortgage Security**

At Thornburg Mortgage, we safeguard your information according to industry security standards and employ advanced Internet technologies to make all online financial transactions secure. These technologies include:

### **Encrypted Transmission**

Once you begin the login process with Thornburg Mortgage and interact with our applications, the exchange of information over the Internet is encrypted. This means the information is scrambled in such a way that it cannot be read by anyone other than you and Thornburg Mortgage. This is accomplished by using the Secure Sockets Layer (SSL) protocol. Secure Sockets Layer protects your information through a browser like Netscape Navigator® or Microsoft Internet Explorer® that supports 128-bit encryption. You know it is working when you see the key or the lock (in the locked position) appear on your browser window.

## Firewalls

Thornburg Mortgage's computer network containing all of your account information is strictly controlled. To limit access into and out of Thornburg Mortgage's computer network, Thornburg Mortgage employs a series of firewalls--specially configured computers that sit between our internal network and the external Internet. These firewalls provide a gateway that controls access to Thornburg Mortgage's online account services, helping to protect your information and our systems from unauthorized activity over the Internet.

In addition, we employ these security standards:

- **Username and Password:** Only your valid Username and Password will allow you to login.
- **Automatic Logoff:** If no action is taken for several minutes, your session will be automatically terminated and you will be logged off.
- **Secure Forms:** When you provide personal information to Thornburg Mortgage through our online forms, it is sent to us in a "secure session" utilizing Secure Sockets Layer (SSL). This ensures your information remains confidential.
- **Constant Monitoring:** We are always monitoring our systems to prevent any potential problems that could compromise security or privacy.