What Lenders Say You Must Know About Protecting Signers’ Privacy

Sessions: 134 & 232

What is NPI or Non Public Information?

- FTC Definition: Any information obtained about an individual from a transaction.

Examples of NPI

- Account numbers
- Loan Payoff amounts and statement
- Credit Card Statements
- Closing Disclosure & Settlement Statements
- Insurance, Drivers License, Tax information
- Social Security Numbers & Date of Birth
- Title related items such as: sales price, commission amounts, loan fees
What is PII or Personally Identifiable Information?

Personally identifiable information (PII), is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. In US privacy law and information security, is often called Sensitive Personal Information (SPI).

Examples of NPI

- Financial, credit, and medical data
- Home address and telephone numbers (including home web addresses)
- Social Security Number
- Birth date
- Mother's maiden name; other names used
- Family data
- Religion, race, national origin
- Performance ratings
- Account Numbers

Importance of Protecting NPI

- Customer Retention
- Avoid Lawsuits & Claims
- Ability to adapt to Industry Changes
- Avoid Bad Press & Tarnished Reputation
Frightening Statistics

The 2015 Identity Fraud Study, released by Javelin Strategy & Research, found that:

- $16 billion was stolen from 12.7 million U.S. consumers in 2014, compared with $18 billion and 13.1 million victims a year earlier.
- There was a new identity fraud victim every two seconds in 2014.

71% of Cyber Attacks are against Small Businesses with less than 100 employees

60% of attacks in 2015 struck small to medium-sized businesses and there are 34,529 known computer incidents each day.
How Do You Protect that Information?

Physical Security
- Storage and Shredding of Confirmations
- Printing of Loan Packages: Using 3rd party services to print
- Storage of Loan Packages
- Destruction of Documents
- Shipping of Loan Packages

Computer Security
- Strong Password Protection
- Limited Computer Access
- Use of Timeout and Lock Screen
- Theft Protection for Laptops and Tablets
Email Security
- Encrypted email
- Frequent and strong password changes
- Spam and junk mail filters
- Documents password protected
- Double check you have the correct recipient

Internet Security
- Strong password that is not shared.
- Hide your network so it doesn’t show your name.
- Use of Public Wireless Networks
- Use of Firewalls and Anti-Virus Programs
- Caution when visiting websites

Cell Phone Security
- Password protected
- Wireless networks – install security apps
- Tracking for theft
- Encrypt the data
- Ability to wipe data
- Removable storage
Did You Know?

Your E&O insurance will most likely not cover a claim due to a breach of data by a cyber leak or attack.

Review Your Processes

- Who repairs your computer?
- Who handles your packages?
- Who has access to your phone and computer?
- Where are your documents stored both physically and online?
Still Reviewing Processes

- Do you take pictures of ID to email?
- Does your copier/printer have a hard drive that stores information?
- Do you share details of your signings with others?
- Periodically check your security measures

What To Do in Case of a Breach?

- Find the source of the breach and shut it down
- Contact your attorney
- Contact law enforcement
- Contact your insurance provider
- Notify your customer

Resources

- ALTA’s Pillar #3
- CFPB Bulletin 2012-03
- FTC – Gramm-Leach-Bliley Act