

IMPAC PRIVACY POLICY

Your privacy is important to us so we hold your personal and transactional information in the strictest confidence. Because we gather certain *nonpublic personal information* about you, we want you to know how we treat personal and confidential information about you. We ask that you please read this notice carefully to understand what we do.

We have implemented privacy policies that are consistent with federal and state law and regulatory requirements. We have also adopted procedures designed to safeguard the security and confidentiality of our customers' records and information which are consistent with federal and state law and regulatory requirements.

By using the term *nonpublic personal information*, we mean personally identifiable information that we collect in connection with your use of our website that is not available publicly. It includes any information you give us when you inquire about a mortgage loan on our website. Our Privacy Policy applies both to current as well as former customers.

How We Protect your Nonpublic Personal Information

We use commercially reasonable security measures to protect against the loss, misuse, and alteration of the information under our control. However, we cannot guarantee the protection of information against interception, misappropriation, misuse, or alteration or that your information may be not be disclosed or accessed by accidental circumstances or by the unauthorized acts of others. You should be aware that we have no control over the security of other sites on the Internet you might visit, interact with, or from which you buy products or services. Our Privacy Policy does not cover third party websites that you may access through our website, so we encourage you to read their privacy policies prior to providing them with any of your personal information.

- We do not disclose any *nonpublic personal information* about you to anyone, except as permitted or required by law.
- We restrict access to your personal and account information to those employees who need to know that information to provide products or services to you;
- We maintain physical, electronic and procedural safeguards that comply with federal regulations and state law to guard your *nonpublic personal information*.

What Nonpublic Personal Information do we collect from you?

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

- You when you directly input information on our website.
- Your transactions with us, our affiliates, or others.
- Internet cookies (an information collecting device from a web server) when you visit our website.
- Outside sources such as credit bureaus and your financial institution.

Information We Collect While You Browse Our Website

We do not access information about your identity while you browse our website. While you visit our website, our system tracks the pages you visit, the pages you download, the site you came from and your browser type and software; it also notes your IP address (but not your identity). We may also use a *cookie* on your computer that tracks your use of our website. A *cookie* is a small piece of data that is stored on your hard drive. It takes up very little room on your system and helps us estimate the number of persons who use our site and which areas of the website are most popular. The *cookie* does not provide us with specific personally identifiable financial information about you such as your name, address, email address or telephone number. You remain anonymous to us as long as you browse the website.

However, once you directly input any information on the website, we may use the information provided and forward that information on to our operations center to process your request. This information may be retained by us for a period of time.

To whom do we disclose your nonpublic personal information?

We may disclose *nonpublic personal information* that we collect about you to conduct routine business with our employees, agents or contractors who work specifically on your file. We may also share within our company to provide you with exceptional service or to market other products that we feel may benefit you. We may disclose *nonpublic personal information* that we receive from you to companies that perform services on our behalf. These service providers include credit bureaus, title companies, appraisal companies, escrow companies and other service providers. These companies are precluded from releasing any information about you to outside sources and are held accountable for securing it.

We also may disclose *nonpublic personal information* we collect about you with our affiliates, in order to provide you with a variety of products that may interest you. We will not share any *nonpublic personal information* with affiliates to the extent prohibited by law. Our affiliates are companies controlled by, owned by, or under common control with Integrated Real Estate Service Corp. ("IRES")

We also may disclose *nonpublic personal information* we collect about you with nonaffiliated third parties with whom we have joint marketing agreements to provide products and services to you, to the extent permitted by law. Such nonaffiliated third parties may include:

- Financial service providers such as mortgage companies and insurance agents;
- Non-financial companies such as retailers, direct marketers and publishers
- Others, such as non-profit companies

We also disclose *nonpublic personal information* to government agencies and consumer reporting agencies for limited purposes necessary to:

- protect against fraud
- report to a consumer reporting agency

- comply with a legal investigation or regulatory requirements including, without limitation, respond to a subpoena, court order or administrative hearing

Opt Out for Affiliate and Nonaffiliated Third Party Sharing of Information

Once you are a customer if you prefer that we not disclose your *nonpublic personal information* to our affiliates and/or nonaffiliated third parties, you may opt out of such disclosures by following the Opt-Out procedures included in this Notice. Please note that, even if you direct us not to share information with our affiliates, we may still share your information with our affiliates as permitted by law, for example, to process transactions or to service your account. Moreover, we may also share certain other types of information with our affiliates, such as your name, address, telephone number, email address and account number(s), and information about your transactions and experiences with us.

How You Can Change Your Nonpublic Personal Information

We are committed to maintaining complete and accurate information about our customers, and we use reasonable measures to ensure the accuracy, timeliness, and thoroughness of this information. If you think any information we have about you or your account(s) may be incorrect, please notify us as soon as possible. We will take prompt action to make the appropriate corrections and to notify anyone with whom we may have shared inaccurate information.

You can review the nonpublic personal information we maintain on you and can make any necessary corrections to it by contacting us either by telephone or in writing at the address listed below.

Changes to this Privacy Policy

From time to time, we will update this Privacy Notice to reflect changes in our policies and practices. Our Privacy Policy in effect from time to time is posted on our website. By electing to become one of our customers, you agree to receive copies of our Privacy Policy and any amendments to it from our website unless you notify us in writing at the address below.

How to Opt-Out of Sharing & Contacting Us

If you have any questions about this Privacy Notice or wish to Opt-Out of any sharing as described in this Notice please write to us at:

Chief Compliance Officer
Impac
19500 Jamboree Road
Irvine, California 92612

Special Notice to California & Vermont Residents

California: In accordance with California law, we will not share information we collect about our California customers outside of the IRES family of companies, except as permitted by law or with

the consent of the customer. We limit the sharing of this information as required by applicable California law.

Vermont: In accordance with Vermont law, we will not share information we collect about our Vermont customers outside of the IRES family of companies, except as permitted by law or with the consent of the customer. We limit the sharing of this information as required by applicable Vermont law.

Effective Date:

July 12, 2010