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SAMPLE

[Sample Client]'s [Sample Client] assist borrowers with access to blocked accounts. Certain authorized [Sample Client] may unlock or reset passwords. When assigned, [Sample Client] cannot view passwords.

3.3 Fair Servicing

[Sample Client] prohibits discrimination against any borrower with respect to all loan administration processes

- on the basis of race, color, religion, national origin, sex or marital status, or age (provided the borrower has the capacity to contract);
- because all or part of the borrower's income derives from any public assistance program; or
- because the borrower has in good faith exercised any right under the Consumer Credit Protection Act.

3.4 Confidentiality and Privacy

[Sample Client] must at all times maintain the confidentiality and privacy of all borrower information and only provide non-public information on borrowers' accounts to borrowers legally responsible to repay the mortgage loan or those authorized by the borrower to receive the information.

[Sample Client] may provide borrower information to third parties for legitimate business reasons as defined in Section 501(b) of the Gramm-Leach-Bliley Act (Federal Privacy Act) Regulation P. [Sample Client] requires the third party to agree to abide by a confidentiality requirement not to disclose the non-public information to other parties.

Security Measures

[Sample Client] utilizes specific methods to keep all non-public borrower information confidential and secure. The methods may vary from area to area depending on the risk involved and the daily procedures of each area. Examples of security measures [Sample Client] may use include the following:

- Password protected electronic documents and folders
- Password protected screen savers
- "Clean desk" procedures
- Shredding sensitive information
- Other measures identified in [Sample Client]'s information security policies and procedures

Each employee, team leader, and manager must adhere to procedures that help insure the confidentiality and privacy of [Sample Client]'s borrowers.

Section 4 Servicing Compliance

4.1.1 Customer Service Inquiries

[Sample Client] must take reasonable care to properly identify the borrower when an inquiry is received by telephone for non-public information on a borrower's loan. [Sample Client] is required to verify a minimum of three specific loan information details.

In the event the borrower's identity cannot be conclusively verified, loan information may not be released over the telephone. However, the requested information may be mailed to the borrower's current mailing address.

Refer to [Section 3.11.1 Customer Service Inquiries](#) of this policy for more details.

4.1.2 Successors in Interest

[Sample Client] must respond quickly to a potential successor by:

- providing a written description of the reasonable documents required to confirm the person's identity and ownership interest in the property, including contact information and a telephone number for further assistance;
- promptly making a confirmation determination of the person's identity and ownership interest in the property;
- notifying the person of the determination.

When a successor in interest is confirmed, [Sample Client] is required to communicate with the successor in interest in all manners required by federal law.

Refer to [Section 3.11.2 Successors in Interest](#) of this policy for more details.

4.1.3 Periodic Statements

[Sample Client] is required to deliver or place in the mail a periodic statement within a reasonably prompt time after the payment due date or the end of any courtesy period provided for the previous billing cycle.

Refer to [Section 3.11.3 Period Statements](#) of this policy for more details.

4.1.4 Borrower Complaints and Requests for Information

Following receipt of a complaint, [Sample Client] must provide a written acknowledgement to the consumer within five days (excluding legal public holidays, Saturdays, and Sundays) and provide written resolution in accordance with the below.