

WARONKER & ROSEN, INC.

PRIVACY POLICY

Waronker & Rosen, Inc. (WRI) adheres to the Federal Trade Commission's (FTC) Final Rule on Privacy of Consumer Financial Information, 16 CFR Part 313, that took effect July 1, 2001.

Florida State Certified Appraisers have been and continue to be bound by the *Uniform Standards of Professional Appraisal Practice (USPAP)* and the Ethics Rule which consists of the conduct, management, confidentiality and record keeping sections. These rules and standards are more stringent than those required by law or regulation. *WRI* has always been diligent about protecting information deemed to be private or confidential in nature.

The Appraisal Standard Board edited USPAP to incorporate the FTC laws.

1. The *Confidentiality* section of the Ethics Rule illustrates that, an appraiser must be aware of, and comply with, all confidentiality and privacy laws and regulations applicable in an assignment. Additionally, text indicates that disclosure of confidential information is permissible to professional peer review committees, except when such disclosure to a committee would violate applicable law or regulation.
2. The definition of "Confidential Information" reads:

...information that is either:

- *identified by the client as confidential when providing it to an appraiser and that is not available from any other source; or*
- *classified as confidential or private by applicable law or regulation.*

Types of Nonpublic Personal Information Collected

Nonpublic and personal information about you and your property is collected during the course of developing and completing the appraisal process. This is generally accomplished with your knowledge and approval. Nonpublic information is normally provided to our company by you or obtained by us with your authorization. The purpose of the appraisal process is to develop a credible value opinion for the client or customer. A credible assignment result is part of the requirement for successful completion of a particular real estate financial transaction or business decisions.

Parties to Whom We Disclose Information

This company does not disclose any nonpublic personal information obtained during the course of developing a property's specific value opinion except as required by law or at the direction of the client to assist in the completion of a particular financial transaction. Such nonpublic information may be disclosed to the client and any identified intended users of the specific appraisal, review, or appraisal consulting assignment. A fiduciary agreement is automatically in effect between our company and the identified client or customer and intended users per the Ethics Rule contained within the USPAP. Additionally, in all such situations, the appraiser must comply with all pertinent laws, rules and regulations regarding the safeguarding of the analyses, conclusions, survey results, adjustments and opinions relative to the appraisal process relative to this specific assignment.

Record-Keeping Requirements

Our agency retains work records relating to the informational services that we provide so that we are better able to assist with your professional needs and to comply with the requirements of the Ethics Rule as contained within the USPAP. In order to secure your nonpublic personal information, our agency maintains physical, electronic and procedural safeguards to comply with our professional standards of practice and provisions of the Gramm-Leech Blily (GLB) Act.

Customer's Right to Limit Public Disclosure or Sharing of Nonpublic Personal Information

Clients/Customers have the right to limit the reuse of their nonpublic personal information gathered during the course of the appraisal development process. The customer must notify this agency within a reasonable time (considered to be 30 days by the FTC) from the appraisal date that public disclosure, or reuse of such information is prohibited except as required by applicable law, regulation, or the appraiser's *Uniform Standards of Professional Appraisal Practice (USPAP)*.

Please feel free to call if you have any questions concerning this policy. Your privacy, our professional ethics and the ability to provide you with a quality product or service are very important to us.

WARONKER & ROSEN, INC.

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This privacy policy was developed by *Waronker & Rosen, Inc.*, as a single corporate entity and all of its individual Associate/Certified Appraisers.