

Name: Privacy Policy

Effective Date: January 5, 2018

Adopted Date: January 1, 2011

Approved By: Curtis Richins, President  
Phil Rasori, Chief Operating Officer  
Chris Anderson, Chief Administrative Officer

**Purpose:**

This policy sets forth MCT's collection, processing, use and storage of data from customers of MCT products and from visitors to our websites, including [www.mctrade.net](http://www.mctrade.net) (collectively, our "Website"). Our Website and MCT products and services are referred to in this Privacy Policy, collectively, as our "Services." MCT customers should also refer to their Master Services Agreement and other customer agreements, which may state additional terms governing their use of our products and services.

**Policy:**

OUR COMMITMENT TO YOUR PRIVACY

This Privacy Policy describes

- How and why we collect certain information from you via our Services;
- How we use and with whom we share this information;
- How you can access and update this information; and
- The choices you can make about how we collect, use and share your information.

If you have any questions regarding this Privacy Policy or our information collection and use practices, please contact us using the information in the "Contact Us" section below.

THE INFORMATION WE COLLECT

MCT collects information from Website visitors and users of our products and services in a variety of manners and obtains information from third parties while providing our Services to customers. This information includes:

- Information You Provide in Sales Inquiries. When you request information through the Website, we ask you to provide your name, company, address, email and telephone number. If you choose to contact us through the contact information available through the "Contact Us" link on the Website, we will collect your email address or your telephone number, and other identifying information you may provide.

- Registration Information. When you register to use one of MCT's products or services, we may collect certain information from you, including your name, email address, and other information that we use to contact you or provide services to you.
- Usage Information. Like most online services, we collect standard technical, information when you use our Services, including, but not limited to unique device identifiers, internet protocol (IP) addresses, browser types, internet service providers (ISPs), the number and duration of page visits and the number of clicks.
- Cookies and Other Technologies. We collect certain information using "cookies" (also called "HTTP cookies" or "browser cookies") and other tracking technologies. Cookies are small files that your browser places on your computer. We may use session cookies, persistent cookies, and other tracking technologies to better understand how you interact with our Services, to monitor usage by our users and web traffic routing on our services, and to improve and personalize our Services. Most Internet browsers automatically accept cookies. You can instruct your browser to stop accepting cookies or to prompt you before accepting cookies from the websites you visit. Google provides some additional privacy options relating to Google analytics, described at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).
- We may also use web beacons, which are transparent graphic images on a webpage or within the body of one of our marketing emails, to allow us to measure visitor actions and assess the effectiveness of our Services or email marketing campaigns. For example, we use web beacons in our email marketing to track instances where a user clicks through a link in the email.
- Borrower Information. During the delivery of our hosted products and services we receive information about our customers' borrowers (which may include non-public personal information ("NPI"), which is provided by our customers. We process this information on the behalf of our customers. Our customers are responsible for providing notice and obtaining appropriate consents to collect data from their borrowers and to provide it to us as their service provider.
- Transactional Information. MCT may also create transactional records of each of the transactions or other events occurring through our Services. This transactional information is generally collected for the purpose of managing interest rate risks associated with mortgage loan application applications and closed loan inventory for sale into the secondary mortgage markets, to enable MCT to provide its Services, to enable the services provided by third parties (including determinations of qualification for loans or the best execution price for sale of the customer's mortgage loans into the secondary mortgage markets), and to enable MCT to comply with various legal obligations.
- Information from the MCT Network. Within the "Services" menu of MCTlive, MCT customers may connect with qualified investors and other third parties to transmit and receive information to achieve the best possible loan sales price and terms. If you select a third party through our network, we may collect (and share with the third-party) select and relevant information about the loan, property, borrower, directly with the third-party (the "Input Data"). We may also collect certain information about your company from you to connect to the third-party on your behalf (Company Information"). We share your Input Data, Company Information, and Login as you may require. If you select a third-party who is not directly connected to our network, you will be directed to log into or otherwise access that third-party site to transact your business. In this circumstance, the privacy policy and terms of service presented on the third-party website will apply to your transactions, and MCT has no control over or responsibility for the information sent or other communications between you and the third-party provider.

## HOW WE USE INFORMATION

We use information we collect through our Services in a variety of ways to provide our Services and to operate our business, including the following:

- To Provide our Services. We use the information that we collect (i) to operate, test, maintain, enhance and provide features of our Services; (ii) to provide services and information that you request; and (iii) to provide support to customers, users, and site visitors.
- To Improve, Analyze, and Personalize our Services. We use the information that we collect (i) to understand and analyze usage trends and preferences; (ii) to monitor and analyze the effectiveness of our Services; (iii) to improve our Services and develop new products, services, features, and functionality; (iv) to personalize our Services, such as remembering your information so that you will not have to re-enter it during your visit or the next time you use our Services, and (v) to provide customized content and information.
- To Contact You. We may use your email address or other information we collect to contact you for administrative purposes such as customer service or to send communications, including marketing or promotional communications relating to our Services.
- Aggregate, De-identified Data. We aggregate and de-identify data collected through our Services and use it for purposes such as creating and publishing reports about the use of our products and services, including loan sale terms, prices, usage patterns, and trends.

## HOW WE SHARE INFORMATION

We may share, transfer, or disclose your information if you consent to us doing so, as well as in the following circumstances:

- To Our Customers. Transactional Information collected through our Services may be available to customer account administrators or other customer account managers and may be shared with investors and third parties to support optimizing the returns from secondary marketing activities and management purposes. MCT customers may use certain information they collect through MCT products and services improve mortgage loan pipeline data quality and loan manufacturing processes.
- To Our Vetted Network Partners. We may make certain information available to third parties for various purposes, including (i) for compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our users' interests, usage patterns, and trends.
- Compliance with Laws and Law Enforcement; Protection of Our Rights. We may disclose your information (including your personal information) to a third party if (a) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request, (b) to enforce our agreements, policies and terms of service, (c) to protect the security or integrity of our Website, or products and services, (d) to protect the property, rights, and safety of MCT, our users or the public from harm or illegal activities, (e) to respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person, or (f) to investigate and defend ourselves against any third-party claims or allegations.

## OUR POLICY CONCERNING CHILDREN

Our Website, products, and services relate to the secondary mortgage market and are intended for the use of adults over the age of 18. We do not knowingly collect any personal information from children and children should not use our Website or our products or services at any time.

## PRIVACY POLICIES OF LINKED SITES AND ADVERTISERS

Our Website, products, and services may contain links to other sites, as well as advertisements from companies linking to their own sites. We are not responsible for the privacy practices or the content of such sites. If you have any questions about how these other sites use your information, you should contact them directly.

## SECURITY

MCT has physical, administrative and technical measures in place to maintain the security, confidentiality and integrity of the information gathered through the MCT Website and the MCT products and services, and to help protect against the loss, misuse and alteration of such information.

## INTERNATIONAL VISITORS

Our Services are hosted in the United States (U.S.) and are intended for use in connection with the U.S. secondary mortgage markets. If you choose to use them from regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your information outside of those regions to the United States for storage and processing. By providing your information, you consent to any transfer and processing in accordance with this Privacy Policy.

## CHANGES TO OUR PRIVACY POLICY

This Privacy Policy may be revised from time to time. If we decide to make material changes to our Privacy Policy, we will make reasonable efforts to notify you of the changes by sending a notice to the primary email address provided to us and/or by placing a notice on our Website.

## CONTACT US

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please send an email to: [canderson@mctrade.net](mailto:canderson@mctrade.net) or write to:

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