

## WFG Underwriting Bulletin



To: All Policy Issuing Agents of WFG National Title Insurance Company  
From: WFG Underwriting Department  
Date: December 31, 2019  
Bulletin No.: NB 2019-06  
Subject: Updated Privacy Statement

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The California Consumer Privacy Act (CCPA) starts impacting operations on January 1, 2020. As drafted it applies to businesses located anywhere if:

1. It “does business” in the State of California
2. Is a for-profit business
3. Directly or indirectly collects or directs the collection of consumer personal information; and
4. Together with any affiliated business or business with which it shares common branding, meets any one of the following thresholds:
  - a. Has annual gross revenues in excess of Twenty-five million dollars
  - b. Buys, receives, sells or shares for commercial purposes the personal information of 50,000 or more consumers, households or devices; or
  - c. Derives 50% or more of its annual revenues from selling consumer’s personal information.

WFG is subject to the CCPA. We suspect a number of our larger agents will be subject to CCPA and encourage them to consult some of the excellent materials available from [ALTA](#) and their legal counsel.

### **What does WFG’s CCPA compliance mean to our agents?**

WFG has always protected the data-security of policy holder and other customer information to the highest degree. In accord with our privacy policy, we do not sell any consumer information and share it only as necessary and appropriate to providing the services requested on behalf of those customers (for example responding to your underwriting questions, providing searches or appraisals, or handling escrows or recording); and, of course, on those rare instances when it’s necessary for handling claims and inquiries. That is not changing.

What will change is that WFG has a new privacy policy that specifically references the new “rights” available to a California consumer under the CCPA. We ask that, effective January 1, you attach the new privacy policy to **Every Commitment or Preliminary Title Report** you generate on behalf of WFG to properly advise your customers of the steps we take to protect their consumer information and if they are a California resident, of their rights under the CCPA.

The WFG Privacy Notice should be in addition to any Gramm Leach Bliley or other privacy notices you provide regarding your agency’s handling of a consumer’s private information. Those agents subject to CCPA in their own right may desire WFG enter a “Service Provider” addendum to your Agency Agreement so as to qualify for certain exemptions within the CCPA. If you desire such an addendum, please contact Alan Fields [afields@wfgnationaltitle.com](mailto:afields@wfgnationaltitle.com) or Steve Winkler [swinkler@wfgnationaltitle.com](mailto:swinkler@wfgnationaltitle.com).

[Click HERE to download the New WFG Privacy Notice.](#)

NOTE: This Bulletin should not be interpreted as reflecting negatively upon the character of an individual or entity mentioned herein and is for the sole purpose of establishing underwriting positions and policies reflecting WFG National Title Insurance Company’s best business judgment. The information contained in this Bulletin is intended solely for the use of employees of WFG National Title Insurance Company, its title insurance agents and approved attorneys. Disclosure to any other person is expressly prohibited unless approved in writing by the WFG National Title Insurance Company’s Underwriting Department.

**The Agent may be held responsible for any loss sustained as a result of the failure to follow the standards set forth above.**