

## **Treatment of Nonpublic Information**

In the course of business, the Columbus Compact Corporation (“the Compact”) collects private and sensitive information about individuals and corporations. As a nonprofit corporation receiving public support, the Compact follows federal and state Open Access and Sunshine laws; such laws provide safe harbors for private information. We guard private information with great care. This notice details our policies and procedures.

### **What Information We Collect**

“Nonpublic personal information” is information that we collect through various application and underwriting processes, for the purposes of providing financial services. Such nonpublic personal information includes tax returns; personal financial statements, corporate tax filings, and credit information. This information comes from information that applicants provide to us as instructed through applications or related forms, information that comes from our agents about past transactions, and information provided by sources such as credit reporting bureaus.

“Nonpublic trade information” is information concerning strategies, operations, finances, processes, or plans of a business concern, where such information has not been shared in a public forum, is not available to the general public, or may provide competitive and irreparable harm to the concern if inappropriately disclosed. This information comes from information provided by applicants through business plans or proposals.

### **Security of Nonpublic Information**

The Compact guards nonpublic personal information and nonpublic trade information with great care. Nonpublic personal information and nonpublic trade information are exempt from disclosure under various Open Access and Sunshine Law at the federal and state levels.

Nonpublic personal information and nonpublic trade information are not subject to Freedom of Information Act requests by the public, nor are they subject to Open Records Access or Sunshine requirements of various levels of government. The confidentiality of nonpublic information will be maintained except as may be required by federal law or court order.

To maintain the security of such information, the Compact restricts access to the nonpublic information. Such information is not subject to Freedom of Information requests by the public. Individuals with authorized access to nonpublic information include:

- Authorized Compact staff members;
- Officers of the Board of trustees of the Compact; and;
- Members of underwriting and/or loan review teams.

Each authorized individual must:

- Receive clear notice of the nonpublic portions of any application;
- Sign a nondisclosure form prior to viewing the information, and;
- Return all copies of such information to the Compact for filing and/or destruction.

The Compact maintains complete records of applications and transactions for no less than seven years following the last transaction. All nonpublic information is stored in secured filing systems, with restricted staff access and no public access.

The confidentiality of nonpublic information will be maintained except, as may be required by deferral law or court order. The confidentiality of nonpublic information will continue to be maintained regardless of whether a service sought was approved or denied, or whether the service has expired.

### **What Information We Disclose**

A variety of information we collect is deemed in the public domain, and is subject to Open Access and Sunshine Law requirements. Such information includes:

- The names and address of individuals and corporations seeking financial assistance;
- The amount and type of funding requested, and
- The general purpose of such funding.

In addition, details related to these transactions are generally not disclosed, but are available upon request. Such information could include:

- Disbursement dates, amounts, and purposes;
- Repayment terms, and
- Repayment history

### **The Compact's Pledge**

We believe in appropriate access to public information. We believe that your privacy should never be compromised. We maintain our policies and procedures to safeguard the private information you share with us.