

April 2, 2019

To whom it may concern:

This letter confirms that A-LIGN and A-LIGN ASSURANCE has completed a Type 2 SOC 1 examination of Heritage Title Company of Austin, Inc.'s (the "Company's"), Title Insurance and Settlement services at the Austin, Texas location.

The scope of the Type 2 SOC 1 examination performed by A-LIGN ASSURANCE included the following control objectives:

<b>Control Area</b>	<b>Control Objective Defined by the Company</b>
Licensing	Controls provide reasonable assurance that the entity establishes and maintains current license(s) as required to conduct the business of title insurance and settlement services.
Escrow Accounting Procedures	Control activities provide reasonable assurance that the entity adopts and maintains appropriate procedures for escrow trust accounts.
Privacy and Information Security	Controls provide reasonable assurance that the entity adopts and maintains a privacy and information security procedures to protect Non-public Personal Information.
Computer Operations – Incident Monitoring and Problem Management	Controls provide reasonable assurance that the entity adopts and maintains a privacy and information security procedures to protect Non-public Personal Information.
Computer Operations – Data Backup	Controls provide reasonable assurance of timely system backups of critical files, off-site backup storage, and regulate off-site rotation of backup files.
Data Transmission	Control activities provide reasonable assurance that data transmissions between the service organization and its users entities and other outside entities are from authorized sources and are complete, accurate, secure, and timely.
Change Management – Network Infrastructure	Controls provide reasonable assurance that new development of and changes to network infrastructure and system patches are authorized, tested, documented, approved, and implemented to result in the complete, accurate, and timely processing and reporting of transaction processing.
Settlement Procedures	Control activities provide reasonable assurance that the entity adopts standard real estate settlement procedures and policies that maintain compliance with federal and state consumer financial laws as applicable to the settlement process.
Title Policy Production and Delivery	Control activities provide reasonable assurance that the entity adopts and maintains procedures related to title policy production, delivery, reporting and premium remittance.
Professional Title Insurance Coverage	Control activities provide reasonable assurance that the entity maintains appropriate professional liability insurance and fidelity coverage.
Consumer Complaints	Control activities provide reasonable assurance that the entity adopts and maintains procedures for resolving consumer complaints.

An examination conducted by A-LIGN ASSURANCE of the Company's description of the Company's system for the Services (the System) was performed to determine whether or not, in all material respects and based upon suitable criteria:

- the Written Assertion, as provided by the Company, fairly presents the System that was designed and implemented throughout the specified Type 2 SOC 1 Review Period (as hereafter defined);
- the controls related to the control objectives stated in the Company's description of the System were suitably designed throughout the specified Type 2 SOC 1 Review Period (as hereafter defined) to achieve those control objectives; and
- the controls related to the control objectives stated in the Company's description of the System operated effectively throughout the specified Type 2 SOC 1 Review Period (as hereafter defined) to achieve those control objectives

The examination was completed based on the assertions made by the Company and in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA).

As of the date of this letter, all testing procedures related to the Company's Title Insurance and Settlement services are complete. Based on our examination we have obtained reasonable assurance, in all material respects, that (1) the description is fairly presented based on the description criteria, and (2) the controls were suitably designed and operating effectively to meet the in-scope control objectives throughout the period February 1, 2018 through January 31, 2019.

Please don't hesitate to contact me if you have any questions.

Regards,



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