



ACCURATE
GROUP

Accurate Group Privacy Policy

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Accurate Group Privacy Policy

Accurate Group, LLC and its affiliates¹ (“Accurate Group” or “we”) are dedicated to protecting your privacy and handling your Personal Information in a secure and confidential manner. Personal Information is information protected under Federal or state law that identifies, describes, relates to, is associated with, or is linked to a consumer. Personal information does not include publicly available information, which includes information that is lawfully made available from federal, state, or local government records. Also, information that is de-identified, anonymized, pseudonymized or aggregated such that it is no longer attributable to you without additional information is not Personal Information. We know that having trust and confidence in the companies you do business with is important to you. We value the trust you have placed in us to protect your Personal Information. We believe that making you aware of how we use Personal Information, and to whom it is disclosed, will form a basis for trust between us. This Privacy Policy provides that explanation.

Your Consent to this Privacy Policy

By submitting Personal Information including browsing Information to Accurate Group, you consent to the collection and use of the information in accordance with this Privacy Policy. We may change this Privacy Policy at any time consistent with applicable privacy laws. This Policy’s effective date reflects the last date changes were made. If you provide information to us following any change of this Policy, that signifies your assent to and acceptance of the changes to the Privacy Policy.

We Are Committed to Safeguarding Customer Information

In order to better serve your needs now and in the future, we may ask you or your lender to provide to us items of your Personal Information. We understand that you may be concerned about what we will do with such Personal Information. We agree that you have a right to know what Personal Information we collect and how we utilize Personal Information. Therefore, together with our affiliates we have adopted this Privacy Policy to govern the use and handling of Personal Information. This Privacy Policy applies to our use and handling of the Personal Information of all of our current and former customers from the date of this Policy until revised. If you are a former customer, we maintain the confidentiality of your Personal Information as if you were still a customer.

Use of Personal Information

We request Personal Information from or about you for our own legitimate business purposes and not for the benefit of any nonaffiliated party. Therefore, we will not release your Personal Information to nonaffiliated parties except: (1) as necessary for us to provide the product or service you have or your lender has requested of us; or (2) as permitted by law.

We may share your Personal Information with our business partners, such as insurance companies, agents, and other real estate settlement service providers. We also may disclose your Personal Information to agents, brokers or representatives to provide you with services you have requested and to third-party contractors or service providers who provide services or other functions to us or on our behalf.

In addition, we will disclose your Personal Information when you directly or indirectly (for example, through your lender) give us permission, when we are required by law or legal process to do so, or when we suspect fraudulent or criminal activities. We also may disclose your Personal Information when otherwise permitted by applicable privacy laws such as, for example, when disclosure is needed to enforce our rights arising out of any agreement, transaction or relationship with you.

¹ Accurate Group, LLC doing business as Accurate Title Group, LLC (Florida), Accurate Group of Indiana, LLC, Accurate Group of Illinois, LLC and Accurate Group of New Hampshire. Texas title products are completed by The Accurate Group of Texas, LLC. Arizona title products are completed by Accurate Group Agency, LLC. Alabama title products are completed by Accurate Settlement Group, LLC.



Confidentiality and Security

We will endeavor to ensure that no unauthorized parties have access to any of your Personal information. To keep your Personal Information confidential, we protect it with physical and electronic safeguards, and we make sure that we abide by applicable security standards. We regularly review our processes and keep abreast of new technology. We do not allow anyone to have access to Personal Information unless we authorize them to do so and they sign an agreement not to use or disclose Personal Information without authorization. In addition, we require all outside firms and contractors we engage to help us with any part of our business, including servicing and data processing, and all companies with which we enter into joint marketing agreements, to maintain the confidentiality of Personal Information in accordance with this Privacy Policy and to comply with all applicable laws.

Types of Information We Collect

We collect Personal Information from the following sources:

- information you provide directly to us
- information you provide to us indirectly, for example, through your lender
- information that your lender or our client, if different from you, provides to us
- information third parties provide to us
- information we obtain from governmental, commercial and online sources and data providers.

Such Personal Information may be obtained from

- the orders you or your representatives transact on our systems
- the orders we transact on our systems on behalf of you or your customers
- your historical order information we maintain on our computer systems.

Personal Information that we collect may include

- identifiers such as a real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, account number, social security number, driver's license number, passport number, or other similar identifiers
- records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, Internet Protocol (IP) address and operating system, browser version, language, and type, domain name system requests, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement
- Geolocation data
- Professional or employment-related information
- Audio, electronic, visual or similar information.

We may also collect information about online activity on our websites, in order to make them more usable, for system administration, troubleshooting, and website improvement, but we do not collect information that identifies you or your customers as an individual in this way without your knowledge.

We may collect device-specific information (such as your hardware model, operating system version, and unique device identifiers). We may associate your device identifiers with your account(s).

Use of the Information We Collect

We use the Personal Information and other information we collect to help us to provide the products and services you or your lender request. We may also use the information you provide to improve our products and services and to develop new products



and services that we think will interest to our clients and their customers. We also use the information to provide reports to our clients concerning their activities on our system. We may keep a record of your communications with us to help solve any issues you might be facing. We may use your email address to inform you about our services. We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Sharing Personal Information with Nonaffiliates

We do not share Personal information with nonaffiliated companies unless you have given us permission to do so or unless it is necessary to maintain your business or service your transaction. We may use certain nonaffiliated companies to perform services on our behalf and at our direction to help us communicate with you, or to help us offer or provide to you products or services in connection with your business or transaction. In these circumstances, we have written agreements that require the parties with whom we are sharing your Personal Information to keep it safe and confidential and to use it only for the purposes we specify. When entering into an agreement to provide services to any financial institution we contractually agree that customers' Personal Information will not be sold. Nor will we share that Personal Information with any other party including our affiliates for purposes that are not related to providing services.

We may share your Personal Information with regulators, law enforcement and other authorities in connection with an investigation, subpoena, or court order or in the good faith belief that such disclosure is necessary to comply with legal process or applicable laws or to protect our rights or property, or the rights, property or safety of our employees or the public.

We Do Not Sell Your Personal Information

We do not permit list brokers, mail-order businesses, telemarketers, or other marketing companies to contact you to promote their products or services, and we do not sell, lend, or give out your Personal Information for this purpose. We may however, transfer Personal Information to a third party as an asset that is part of a merger, acquisition, or other transaction in which the third party assumes control of all or part of our business provided that your Personal Information will continue to be protected consistent with this policy.

Minors

Accurate Group websites and mobile applications are not intended or designed to attract persons under the age of eighteen. We do not knowingly collect information from persons we know to be under the age of eighteen without permission from a parent or guardian.

International Users

If you reside outside the United States and choose to provide Personal Information including browsing Information to us, please note that we may transfer such information outside of your country of residence. By providing us with your Personal Information including any browsing Information, you consent to our collection, transfer, and use of such information in accordance with this Privacy Notice.

For California Consumers

California consumers are entitled to know about their Personal Information that we collect, use, disclose or sell. We will not share your Personal Information with nonaffiliated third parties, except as permitted by California law. California consumers may submit a request to us that we identify to you the categories and specific items of Personal Information about you that we collected, used, disclosed or sold. California consumers may also request that we delete your Personal Information. You may make such requests by calling our Customer Service Department toll-free at 888-258-5757 or by contacting us through our website at <http://www accurategroup.com/company/contacts/>. We may request additional information from you or your authorized agent with which to verify your identity for the security of such requests and we may exercise our rights under applicable law to not fulfill your request. If you use an authorized agent to make a request, we will require you to provide written



authorization to the agent and allow us to confirm the identity of the agent. We will not discriminate against California Consumers for exercising any of their rights under the California Consumer Privacy Act.

For Nevada Consumers

Nevada Consumers may be placed on our internal Do Not Call List by contacting our Customer Service Department toll-free at 888-258-5757 or by contacting us through our website at <http://www accurategroup.com/company/contacts/>. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number: (702) 486-3132; email: BCPINFO@ag.state.nv.us.

For Oregon Consumers

We will not share your Personal Information with nonaffiliated third parties for marketing purposes, except after you have been informed by us of such sharing and had an opportunity to indicate that you do not want a disclosure made for marketing purposes.

For Vermont Consumers

We will not disclose information about your creditworthiness to our affiliates and we will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

Correcting Personal Information and Contacting Accurate Group

If you want to correct or update your Personal Information, please contact our Customer Service Department toll-free at 888-258-5757 or contact us through our website at <http://www accurategroup.com/company/contacts/>. You may write to us at Accurate Group, LLC, 6000 Freedom Square, Suite 300, Independence, OH 44131, attention Customer Service.