

## PRIVACY POLICY

### Introduction

We are committed to protecting and respecting your privacy. This Privacy Policy (“Policy”) will help you understand how we collect, use, and protect any personal data (or personal information, we use these terms interchangeably in this policy) we collect from you, or that you provide to us, either directly or through our trusted partners. Please read this Policy carefully to understand our treatment and use of personal data.

This Policy applies to our processing of personal data about you, our customers, our potential customers, and visitors to our website. If you are an employee or contractor of Munich Re or its affiliates, or if you are applying to be, please refer to Munich Re’s Staff Privacy Notice for information on how we process your personal data.

In the context of this Policy, “processing” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation, disclosure, sharing and transmission for the purposes described below.

In essence, we collect and process personal information necessary to issue you an insurance policy (like your name, address, telephone number, payment information), to assist you if you need to file a claim, or to provide you with information on our products or special offers. We are also required to collect and process certain information to meet legal and regulatory requirements (for example, to verify your identity). While we share your information with our business partners, including our affiliates, we do not sell your data.

You may have certain rights with respect to this personal information as well, so we encourage you to read this Policy carefully, and to contact us if you have any questions.

### Identification of the Controller

For purposes of this Policy, American Digital Title Insurance Company is the controller of personal data we collect from you. We partner with companies (our “Clients”) and may collect information about you from them. Our Clients include, but are not limited to, insurance companies, insurance agencies, insurance producers, claims management entities, insurance service providers, law firms, consultants, translators, and others. For information on how to contact our Clients and their specific practices, you may use the information found in the “Contact us” section below.

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As controllers, we make decisions about how and why we process personal data about you and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws.

### **What types of personal data do we collect, where do we get it from, and why?**

We will typically collect personal data directly from you or from our business partners. We may also collect personal data about you through your interactions with our information technology resources. We will also create records of personal data about you in the course of providing services or products to you, either directly or through our business partners. We may also collect personal data about you from third-parties, including government agencies and third-parties who provide services to us.

In all cases, we will collect personal data about you in accordance with the principles outlined in this Policy and applicable local law.

You should be aware that our “lawful basis” for processing personal data about you may be impacted by the legal requirements in the country you in which you reside. As such, outside of the European Economic Area (“EEA”) and the United Kingdom (“U.K.”), we may at times rely on consent to process personal data about you, whereas within the EEA and the U.K. we will seldom rely on consent as the lawful basis for processing personal data about you, except as indicated below.

The following table provides more detailed information on the information we collect and why:

Category	Basis of processing	Purpose of processing
If you apply for, inquire about, or obtain a service or product from us, we collect a range of identifiable personal information based on the particular product and circumstances, possibly including: name, address, contact information, social security number or other government-issued identification number, financial and account information, health information that may include biometric information, demographic information, and commercial information about your previous interactions with us.	It is necessary for the performance of our contract with you, or to take steps necessary to enter into such a contract; or is necessary for us to comply with a legal obligation.	This data helps us underwrite your risk, to communicate with you, to handle claims under your policy, and to ensure compliance with regulations, such as Know Your Customer rules.

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<p>If you do business with one of our Clients, we may collect personal information about you to allow us to identify and offer you products that may be of interest to you. This information may include your name, address, contact information, social security number or other identifier, financial information, demographic information, commercial information about your purchasing history, employment and professional information, and inferences based on this information regarding your preferences.</p>	<p>It is necessary for the purposes of our legitimate interests, or is based on your consent.</p>	<p>This data is used to offer products and services that may be of interest to you as permitted and subject to applicable law.</p>
<p>If you do business with one of our Clients, we may collect personal information about you to allow us to help our Clients improve the services and products that they offer to you, or to help them provide the services and products that you have requested. This information may include your name, address, contact information, social security number or other identifier, financial information, demographic information, commercial information about your purchasing history, employment and professional information, and inferences based on this information regarding your preferences.</p>	<p>It is necessary for the performance of our Client's contract with you, or to take steps necessary to enter into such a contract; or is necessary for us, or our Client to comply with a legal obligation.</p>	<p>We help our Clients provide high quality products and services to you, and to improve those products and services. You should refer to the Clients' privacy policies for details on how and why they collect and process information about you.</p>
<p>If you go to our website, <a href="http://www.americandigitaltitle.com">www.americandigitaltitle.com</a>, we collect internet or other electronic identifiers, such as Internet Protocol address, mobile device identifiers, and other electronic identifiers that might uniquely identify you, along with information about your interaction with our electronic services.</p>	<p>It is necessary for the purposes of our legitimate interests to maintain the security and integrity of our computer systems and to administer</p>	<p>This is required to help diagnose problems with our computers and to maintain and improve our website. Also, we may use a log file of IP addresses to gauge overall usage, traffic, and performance of our</p>

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	our website quality.	website. Even though it could be used to uniquely identify users, we do not use IP addresses, or have the ability to use IP addresses, to personally identify users or to track the usage patterns of individual users.
If you express interest in becoming a Client or have become a Client, we will collect contact information from you, including your name, postal addresses, email addresses, and telephone numbers. Most of the time this will only be business contact information, and not personal information.	It is necessary for the performance of our, or our Clients', contract with you, or to take steps necessary to enter into such a contract; or is necessary for us to comply with a legal obligation.	This data helps us to communicate with you and to ensure our compliance with regulations.

### Cookies

While you are on-line, your computer saves so-called "cookies." These are small files that control how our website is displayed and operates. Cookies do not damage your computer and do not contain viruses. Cookies serve to make our website more user-friendly, effective and secure.

Most of the cookies we use are "session cookies" which are automatically deleted as soon as you leave the site. Other cookies remain on your computer until you delete them. Such cookies allow us to recognize your browser the next time you visit, and the browser settings let previously viewed pages load faster, for example. We use cookies to offer you the best possible experience on our website.

We therefore save them and analyze their data – although they do not identify you personally. This improves the usefulness of our website. We perform anonymous statistical analyses of our internet presence, and do not identify you personally.

You can change your browser settings so that you are notified when cookies are being used, and you can allow them only once, or refuse them in certain cases or completely.

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You may also activate the automatic deletion of cookies when you close your browser. Deactivating cookies may restrict website functionality.

### Server log data

The information that your browser automatically sends us is collected automatically and saved in server log files. They contain:

- browser type and version;
- operating system used;
- referrer URL (the URL that the user comes from);
- host name (network name) of the accessing computer;
- time of server request.

This data is not used to identify individual people. We do not merge this data with other data sources. We reserve the right to review the information subsequently, and report it to authorities (such as the police or public prosecutor's office), if there are concrete indications that our internet presence is being used illegally (for example, a hacking attack on our network).

### Who do we share your personal information with, and why?

We may disclose your personal information to our Clients and to service providers for the purposes set out above. For example, using service providers may be necessary for the administration and maintenance of our IT systems. We may also transfer information, including your personal information, to third parties necessary to fulfill the purposes set out above, such as underwriting your risk or assisting in providing services to you that you requested. We require our services providers to provide assurances regarding the protections they will provide for any personal data transferred to them, and their compliance with our security requirements and any applicable international data transfer restrictions.

In certain circumstances, we share or are obliged to share your personal data with third parties for the purposes described above and in accordance with applicable data protection legislation.

These third parties include:

- regulatory authorities;
- our auditors and legal advisors;
- relevant industry self-regulatory bodies; and
- others, where it is permitted by law, or where we have your consent.

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We do not disclose your personal data to nonaffiliated third parties for those third parties' direct marketing purposes, nor do we sell your personal data. If you would like information about opting out of other discretionary sharing of your personal information with third parties please contact us (see "Contact us" section below).

We may share your information with our corporate affiliates (e.g., our parent company, sister companies, subsidiaries, joint ventures, or other companies under common ownership or control of our ultimate parent company). This sharing is done so that these affiliates can provide services to us and to our Clients, and may be necessary to provide you with services, products, or information you have requested or expressed an interest in.

Your information may be transferred to another country for processing. Consistent with our Policy, we will seek consent for the transfer or rely on another lawful basis if that is required under applicable law with respect to that transfer. Those other bases may include: where the relevant regulator has determined that the country to which the data will be transferred provides an adequate level of legal protection for personal data, where an approved legal mechanism is in place to affect such transfers, or where you have provided your consent. For any transfers of personal data from the EEA to the U.S. or from the U.K. to the U.S., we take additional steps in line with applicable data protection legislation. We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights; e.g., we have in place binding corporate rules to facilitate transfers of personal data to and among Munich Re entities worldwide in compliance with EEA and U.K. data protection laws.

If you would like to see a copy of any relevant provisions, please contact us (see "Contact us" section below).

### **Where do we keep your personal data and how long do we keep it?**

We store personal data about you on computer systems operated by or under the supervision of American Digital Title Insurance Company or our affiliates or service providers and/or at our facilities. Our primary data center is located in Oregon. We will maintain personal data about you for as long as necessary in connection with both our and your legal rights and obligations for the purposes for which it was collected, to defend or advance legal claims, or as otherwise required by applicable laws. We will delete personal data about you within one year of the expiration of a required retention period, as described above, at your request (where such request conforms to the relevant legal requirements and is not otherwise limited), and in any case, upon expiration of the maximum storage term set forth by applicable law.

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## How is my personal data secured?

We have appropriate measures in place to prevent personal data from being accidentally lost, used, or accessed in an unauthorized way. We limit access to personal data to those who have a business need for such access. Those individuals who process personal data on our, our affiliates, or our Clients' behalf, may do so only in an authorized manner. They are also subject to a duty of confidentiality. We have policies in place that regulate how American Digital Title Insurance Company employees and contractors must handle data, including personal data about you. We limit access to our premises and to our computer networks, and take appropriate steps to safeguard against unauthorized access to such premises and networks. We have procedures in place to manage any suspected data security breach and will notify you and any applicable regulator of a suspected data security breach consistent with legal requirements.

## Your Rights

Depending upon where you live, or depending on your jurisdiction, you may have certain rights, briefly summarized below, under applicable data protection legislation in that country or state. Please note, you may not have access to all of these rights, and only those relevant in your jurisdiction may apply.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we need to rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Your rights may include (as relevant):

Your right	What does it mean?	Conditions to exercise?
Right of access	Subject to certain conditions, you are entitled to have access to your personal data which we hold (this is more commonly known as submitting a "data subject access request").	We must be able to verify your identity. Your request may not affect the rights and freedoms of others, e.g., privacy and confidentiality rights of other customers. Data solely retained for data backup purposes is principally excluded.
Right of data portability	Subject to certain conditions, you may be entitled to receive the data that you have provided to us and that is processed by	Data protection legislation does not necessarily establish a general right to data portability.

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	<p>us by automated means, in a commonly-used machine readable format.</p>	<p>In the EEA and the U.K., we must first be able to verify your identity. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (e.g. not for paper records). It affects only personal data that was “provided” by you. Hence, it does not, as a rule, apply to personal data that was created by us or obtained from other sources.</p> <p>In California, we must first be able to verify your identity, and we may choose to provide the information by mail, in which case it may not be in an easily portable format. We are not required to respond to more than two requests by you for this information in any 12-month period. This right only applies to data we have collected about you; it does not, as a rule, apply to personal data that was created by us.</p>
<p>Rights in relation to inaccurate personal or incomplete data</p>	<p>You may challenge the accuracy or completeness of personal data which we process about you. If it is found that personal data is inaccurate, you are entitled to have the inaccurate data removed, corrected, or completed, as appropriate.</p>	<p>This right only applies to personal data about you. When exercising this right, please be as specific as possible.</p>
<p>Right to object to or restrict our data processing</p>	<p>Subject to certain conditions, you have the right to object to or ask us to restrict the processing of personal data about you.</p>	<p>This right applies only if the processing of personal data about you is explicitly based on our so-called “legitimate interests” (see “<i>basis of processing</i>” above). Objections must be based on</p>

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		grounds relating to your particular situation. They must not be generic so that we can demonstrate that there are still lawful grounds for us to process your personal data.
Right to have personal data erased	Subject to certain conditions, you are entitled, on certain grounds, to have your personal data erased (also known as the “ <i>right to be forgotten</i> ”); e.g., where you think that the information we are processing is inaccurate, or the processing is unlawful.	There are various lawful reasons why we may not be in a position to erase personal data about you. This may apply: (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, or (iii) where retention periods apply by law or our statutes.
Right to withdrawal	You have the right to withdraw your consent to any processing for which you have previously given that consent.	If you withdraw your consent, this will only take effect for the future.

In addition, California law entitles California residents who have used our services for personal, household, or family purposes, to request information concerning whether we have disclosed certain information about you within the past year to any third parties for the third parties’ direct marketing purposes. California users who wish to request further information in compliance with this law or have questions or concerns about our privacy practices and policies may contact us as specified in the "Contact us" section below.

As noted above, we do not sell your personal information to third parties for their direct marketing purposes.

### Children and minors

We do not knowingly collect personal information directly from individuals under 17 years of age. Our services are not intended for individuals under 17 years of age. No one under 17 years of age should submit or post personal information through our services. We may collect personal information regarding individuals under 17 years of age from their parents or legal guardians, but only as necessary to provide our products and services. We urge parents and legal guardians to spend time online with their children and to participate in and monitor the online activities of their children.

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## Your right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy you might have, you may have the right under data protection legislation in your country (where applicable) to lodge a complaint with the relevant data protection supervisory authority in your country if you consider that we have infringed applicable data protection legislation when processing personal data about you. This means the country where you are habitually resident, where you work, or where the alleged infringement took place.

## Changes to this information

We reserve the right to change this Privacy Policy at any time in our sole discretion. If we make changes, we will post the revised policy here, so that you can see what information we gather, how we might use that information, and in what circumstances we may disclose it. By continuing to use our services after notice is provided, you accept and agree to this Privacy Policy as modified.

## Contact us

If you have any questions about this Policy or your data subject rights under applicable laws, please contact us at:

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Attention: Privacy  
222 East 14th Street  
Cincinnati, Ohio 45202  
Toll-free: +1-855-706-8589  
[www.americandigitaltitle.com](http://www.americandigitaltitle.com)

by email at:

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