

## **Accurate Group Privacy Policy**

We are dedicated to protecting your privacy and handling your information in a secure and confidential manner. 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 information. We believe that making you aware of how we use your non-public personal information ("Personal Information"), and to whom it is disclosed, will form the basis for a relationship of trust between us and you. This Privacy Policy provides that explanation. We reserve the right to change this Privacy Policy from time to time consistent with applicable privacy laws.

### **We Are Committed to Safeguarding Customer Information**

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

### **Use of Information**

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

We may share your information with our affiliates, 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 on our behalf.

In addition, we will disclose your Personal Information when you direct or give us permission, when we are required by law 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.

### **Confidentiality and Security**

We will use our best efforts to ensure that no unauthorized parties have access to any of your information. To keep your information strictly confidential, we protect it with physical and electronic safeguards, and we make sure that we abide by applicable federal security standards. We regularly review our processes and keep abreast of new technology. We do not allow anyone to have access to information unless we authorize them to do so and they must sign an agreement not to use or disclose your information without authorization. In addition, we require all outside firms and contractors we hire 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 your information in accordance with this Privacy Policy and to comply with all applicable laws. We may, however, report your information to government

regulators and law enforcement agencies, as permitted or required by law in connection with a fraud investigation or in response to a subpoena or legal process.

## **Types of Information We Collect**

We collect information from the following sources:

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

We may also collect information about online activity on our websites, in order to make them more usable, 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 information we collect to help us provide the products and services you request and to develop new products and services that we think will interest you and your customers. We also use the information to provide reports to our customers 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 Information With Nonaffiliates**

We do not share information with nonaffiliated companies unless you have given us permission to do so or unless it is necessary to maintain or service your business. 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 you with products or services in connection with your business. 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 information with any other party including our affiliates for purposes that are not related to providing services to you or your customers.

## **We Do Not Sell Your Information**

We do not permit list brokers, mail-order businesses, telemarketers, or other marketing companies to contact you or your customers to promote their products or services, and we do not sell, lend, or give out your information for this purpose.