

# Accurate Group Privacy Policy

## [California Consumers](#) [Right of Correction](#) [Contact Us](#)

This Privacy Policy (“Policy”) sets forth how Accurate Group, LLC and its affiliates<sup>1</sup> (“Accurate Group” or “we”) collect, share, store, and use your Personal Information, whether we obtain the information from you or your financial, insurance or real estate services provider (“Provider”). We may obtain your information when you communicate with us in person, by email or telephone, or otherwise, and when you access or use our websites or other technology including mobile applications. 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 (a) publicly available information, which includes information that is lawfully made available from federal, state, or local government records or (b) information that is de-identified, anonymized, pseudonymized or aggregated such that it is no longer attributable to you without additional information.

This Policy applies to our use and handling of 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.

### I. Your Consent to this Privacy Policy

Please read this Policy carefully. The practices described herein are subject to the laws in the places in which we operate.

BY SUBMITTING PERSONAL INFORMATION INCLUDING BROWSING INFORMATION TO ACCURATE GROUP OR BY ACCESSING OR USING OUR APPLICATIONS (INCLUDING MOBILE APPS), PRODUCTS, SERVICES OR WEBSITES, YOU REPRESENT THAT YOU HAVE READ AND UNDERSTOOD THIS POLICY AND YOU CONSENT TO THE COLLECTION AND USE OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THIS POLICY.

WE MAY CHANGE THIS POLICY AT ANY TIME CONSISTENT WITH APPLICABLE PRIVACY LAWS. THIS POLICY’S EFFECTIVE DATE REFLECTS THE LAST DATE CHANGES WERE MADE. YOUR CONTINUED USE, ACCESS, OR INTERACTION WITH THE APPLICATIONS, WEBSITES, OR PRODUCTS, OR YOUR CONTINUED COMMUNICATIONS WITH US AFTER THE UPDATED POLICY HAS BEEN POSTED WILL REPRESENT THAT YOU HAVE READ AND UNDERSTOOD THIS POLICY.

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<sup>1</sup> 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. "Affiliate" means an entity that directly or indirectly controls, is controlled by or is under common control with an entity. "Control" means an ownership, voting or similar interest representing fifty percent (50%) or more of the total interests then outstanding of the entity in question. Accurate Group’s Affiliates include The Accurate Group of Texas, LLC, Accurate Group Agency, LLC, Accurate Settlement Group, LLC, Coast to Coast Title & Escrow, LLC, eMerge Property Solutions, LLC, and Arrowbase Technologies, Inc.

Our applications and websites may contain links to third-party websites and services. Such links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly recommend you review. This Privacy Notice applies to our Applications and Websites only, and we do not accept any responsibility or liability for the policies or practices of any third parties.

## II. Type of Information We Collect about You

Through your communications with us and our communications with third parties, we may collect information within the following categories from you:

- *identity Information* including but not limited to name, alias, Social Security Number, driver's license, passport, or other government ID number, license plate number, unique online identifier, username and password, social media handle,
- *contact information* including but not limited to postal address, street address, email address, IP address, phone number,
- *demographic information* including but not limited to protected characteristics under federal and state law, such as age, sex, gender, race, and ethnicity,
- *financial account information* including but not limited to loan or bank account information (e.g., account name and/or account number), credit, or debit card number, card expiration date, CVC2, CVV2, financial information, insurance policy number,
- *biometric information* such as fingerprints and temperature reading,
- *geolocation data* such as your time zone, latitude and longitude, computer or mobile device location,
- *audio, electronic, visual, and thermal information* including telephone recordings, electronic communication records, security camera footage from our offices,
- *professional or employment-related information* such as your work history, salary history, and education history,
- *Internet or other electronic network activity information and online behavioral data* including, but not limited to, browsing history, search history, Internet Protocol (IP) address and operating system, log data, browser type and version, language, and type, browser settings, operating systems and platform, device type, device-specific information (such as your hardware model, operating system version, and unique device identifiers) operating information, mobile carrier, domain name system requests, and information regarding your interaction with an Internet website, application, or advertisement, page response time and download errors,
- *commercial information* including records of products or services purchased, obtained, or considered, and other purchasing and consuming histories and tendencies.

## III. How We Collect Your Information

We collect your information in three ways:

*Directly from you* when you access or use our applications, websites, or products, or when you communicate with us in any manner, including but not limited to:

- Information you provide by filling forms in person or electronically through our applications and/or websites, including information provided at the time of registering for any product or event, posting material or requesting further services or information,
- Information you provide when you access or use our products,
- Information you provide when you report a problem with our applications or websites,
- Records and copies of your correspondence if you contact us,
- Your responses to surveys that we might ask you to complete,

- Details of transactions you carry out through our applications, websites, and the conduct of transactions, and
- Your search queries on our websites.

*Automatically* when you access or use our applications, websites, or products, or when you communicate with us, including but not limited to:

- Details of your visits to the websites and applications, including traffic data, location data, logs and other communication data,
- Information about your computer and mobile device, and internet connection, including your IP address, operating system, and browser type, and
- Interactivity with an e-mail, including opening, navigating, and click-through information.

*From third parties* including but not limited to:

- the orders you or your representatives or your financial, insurance or real estate services providers transact on our systems,
- Data analytics providers for the purpose of receiving statistical data about your activity on our websites and applications,
- Social media networks for the purpose of collecting certain of your social media profile information and activity including your screen names, profile picture, contact information, contact list, and the profile pictures of your contacts, through the social media platform,
- Third Party Service Providers including but not limited to internet service providers, fraud prevention services, and related partners, and
- Public sources, including local, state, and federal government agencies and departments, to facilitate your use of the websites and applications, and to provide you with our products and services.

## IV. Use of the Information We Collect

We use the personal information and other information we collect to

- provide the products and services you or your financial, insurance or real estate services provider request and the applications and websites that may facilitate delivery and production of our services,
- improve our products and services and to develop new products and services that may be of interest to our clients and their customers,
- operate our business and the applications and websites, including access management, internal operations, troubleshooting, data analysis, testing, research, and for statistical purposes,
- facilitate payment processing,
- optimize content for your device,
- associate your device identifiers with your account(s), Information about online activity on our websites, in order to make them more usable, for system administration, troubleshooting, fraud investigation, and website improvement,
- enforce compliance with our Standard Terms of Use and protect the integrity and maintain security of our business, applications, websites, and products and to protect against identity theft and fraud,
- provide reports to our clients concerning their activities on our system,
- communicate with you about our, our affiliates', and others' products and services, jointly or independently,
- help solve and respond to any issues you might be facing and address any claims,
- provide information to our representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements in reliance on our legitimate interests.

We will not attempt to re-identify de-identified data.

## V. Retention, Protection and Disposal of Personal Information

We store personal information for as long as necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. No system can guarantee the complete security of your information, however, we take commercially reasonable steps to ensure your information is protected consistent with all applicable laws and regulations, as appropriate to the sensitivity of your information. If we dispose of your personal information, we will do so in a way that is secure and appropriate to nature of the information subject to disposal.

## VI. Sharing Personal Information

We may disclose or share your information with our affiliates to facilitate your use of our applications, websites, and products, and to aid our operations by identifying and repairing errors that impede intended functionality and to protect against malicious, deceptive, fraudulent, or illegal activity. We do not share Personal information with nonaffiliated companies unless you have given us directly or through your financial, insurance or real estate services provider permission to do so or unless it is necessary to maintain your business or service your transaction. We may obtain your consent in writing; online, through "click-through" agreements; when you accept the terms of use on our applications or websites; orally, either in person or on the phone; or by other means. We may use certain companies, including but not limited to internet service providers, data analytics providers, government entities, operating systems and platforms, some of which may be offshore or in foreign jurisdictions, to perform services on our behalf and at our direction to help us communicate with you, or to help us offer or provide products or services to you in connection with your transaction. In these circumstances, we have written agreements that require the parties with whom we may share 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 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 may also share your personal information when we have a good faith or reasonable belief that access, use, preservation or disclosure of such information is necessary to protect or assert our legal rights or interests, to facilitate or verify the appropriate calculation of taxes, fees, or other obligations due to a local, state, or federal government, and to protect users of our applications, websites, and products and other carriers or providers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

## VII. 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.

## VIII. Third Party Tracking / Do Not Track

Our websites and applications may collect information about your online activities. When you use our websites and applications, third parties may also collect information about your online activities, over time and across different internet websites, online or cloud computing services, online applications, or mobile applications. Some browsers support a "Do Not Track" feature, which is intended to inform websites that you do not wish to be tracked across different websites you visit. Our Websites do not currently change the way they operate based upon detection of a "Do Not Track" or similar signal.

## IX. Cookies and Related Technology

Browser cookies, beacons, pixel tags, scripts, and other similar technologies may be deployed by us to support our applications, websites and products. A cookie is a piece of information in a small text file that may be stored in your Internet browser or on your hard drive to improve your user experience and to help us to improve our technology and services. Cookies are transferred from our websites and applications to your computer or device and allow us to identify your computer or device whenever you connect to our application or website. You may wish to restrict the use of cookies or completely prevent them from being set. Most browsers allow users to manage cookie behavior. If you disable cookies, please be aware that some of the features of our applications or websites may not function correctly. To find out more on how to manage and delete cookies, you can visit [www.aboutcookies.org](http://www.aboutcookies.org). We may also use analytic software, such as Google Analytics and others, to help better understand how our Applications and Websites function on your device(s) and for other analytical purposes

## X. Social Media Integration

Our applications, websites, and products may contain links to and from social media platforms. You may choose to connect to us through a social media platform, such as Facebook or Twitter. When you do, we may collect additional information from or about you, such as your screen names, profile picture, contact information, contact list, and the profile pictures of your contacts, through the social media platform. Please be advised that social media platforms may also collect information from you. We do not have control over the collection, use and sharing practices of social media platforms. We therefore encourage you to review their usage and disclosure policies and practices, including their data security practices, before using the social media platforms.

## XI. Information for Minors, International Users, and Users in Specific States

### A. 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.

### B. 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. If your use of our applications, websites, or products would be unlawful in your jurisdiction, you may not use our applications, websites, or products.

### C. For California Consumers

Under the California Consumer Privacy Act of 2018 and its implementing regulations, you have a Right to Know, Right to Delete, and Right to Non-Discrimination.

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.

California Minors. If you are a California resident under the age of 18, California Business and Professions Code § 22581 permits you to request and obtain removal of content or information you have publicly posted on any of our applications or websites. To make such a request, please call our Customer Service Department toll-free at 888-258-5757 or contact us through our website at <http://www.accurategroup.com/company/contacts/> with a detailed description of the specific content or information. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and there may be circumstances in which the law does not require or allow removal even if requested.

### D. For Colorado Consumers

Under Colorado's Consumer Privacy Act ("CPA"), which goes into effect July 1, 2023, Colorado residents have certain rights with respect to collection, use, and sharing of their personal data. Company does not sell your personal data and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law.

Also, we do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Company does not engage in "targeted advertising" as that term is defined in the CPA. Company collects various categories of personal data when performing services, including identifiers, commercial information, internet or other electronic network or device activity information, geolocation data, and professional information.

A more detailed description of the information Company collects and how we use it is provided above in “How we Collect your Information” and Use of Information.” We describe above in Section VI the categories of third parties with whom we share personal data, and what information may be shared under different circumstances.<sup>[SEP]</sup> If you are a resident of Colorado, starting July 1, 2023 you will have the right to (1) request to know what personal data has been collected about you, and to access that information; (2) request to correct inaccuracies in your personal data; (3) request deletion of your personal data, though exceptions under the CPA and other laws may allow us to retain and use certain personal data notwithstanding your deletion request; and (4) obtain a copy of your personal data. To make such a request, please call our Customer Service Department toll-free at 888-258-5757 or contact us through our website at <http://www accurategroup.com/company/contacts/> with a detailed description of the specific content or information. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and there may be circumstances in which the law does not require or allow removal even if requested.

#### E. For Connecticut Consumers

Under Connecticut’s Data Privacy Act (“CTDPA”), which goes into effect July 1, 2023, Connecticut residents have certain rights with respect to collection, use, and sharing of their personal data. Company does not sell your personal data and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law.

Also, we do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Company does not engage in “targeted advertising” as that term is defined in the CPA. Company collects various categories of personal data when performing services, including identifiers, commercial information, internet or other electronic network or device activity information, geolocation data, and professional information.

A more detailed description of the information Company collects and how we use it is provided above in “How we Collect your Information” and Use of Information.” We describe above in Section VI the categories of third parties with whom we share personal data, and what information may be shared under different circumstances.<sup>[SEP]</sup> If you are a resident of Connecticut, starting July 1, 2023 you will have the right to (1) request to know what personal data has been collected about you, and to access that information; (2) request to correct inaccuracies in your personal data; (3) request deletion of your personal data, though exceptions under the CTDPA and other laws may allow us to retain and use certain personal data notwithstanding your deletion request; and (4) obtain a copy of your personal data. To make such a request, please call our Customer Service Department toll-free at 888-258-5757 or contact us through our website at <http://www accurategroup.com/company/contacts/> with a detailed description of the specific content or information. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and there may be circumstances in which the law does not require or allow removal even if requested.

#### F. 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.

### G. 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.

### H. 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.

### I. For Virginia Consumers

Under Virginia's Consumer Data Protection Act ("VaCDPA"), which goes into effect January 1, 2023, Virginia residents have certain rights with respect to collection, use, and sharing of their personal data. Company does not sell your personal data and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law.

Also, we do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Company does not engage in "targeted advertising" as that term is defined in the VaCDPA. Company collects various categories of personal data when performing services, including identifiers, commercial information, internet or other electronic network or device activity information, geolocation data, and professional information.

A more detailed description of the information Company collects and how we use it is provided above in "How we Collect your Information" and Use of Information." We describe above in Section VI the categories of third parties with whom we share personal data, and what information may be shared under different circumstances.<sup>[SEP]</sup> If you are a resident of Connecticut, starting July 1, 2023 you will have the right to (1) request to know what personal data has been collected about you, and to access that information; (2) request to correct inaccuracies in your personal data; (3) request deletion of your personal data, though exceptions under the VaCDPA and other laws may allow us to retain and use certain personal data notwithstanding your deletion request; and (4) obtain a copy of your personal data. To make such a request, please call our Customer Service Department toll-free at 888-258-5757 or contact us through our website at <http://www.accurategroup.com/company/contacts/> with a detailed description of the specific content or information. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and there may be circumstances in which the law does not require or allow removal even if requested.

## XII. Right of Correction

Regardless of where you live, you may submit a request that we correct or update the information we have about you.



## Contact Us

[csr@AccurateGroup.com](mailto:csr@AccurateGroup.com) or toll free at 888-258-5757

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