

Accurate Group Privacy Policy

This Privacy Policy (“Policy”) sets forth how Accurate Group, LLC and its affiliates¹ (“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 applicable 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 identifiable to you without additional information.

This Policy applies to our use and handling of Personal Information of our current and former customers from the date of this Policy until revised. If you are a former customer, we maintain 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.

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

¹Accurate 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. Accurate Group’s Affiliates include The Accurate Group of Texas, LLC, Accurate Group Agency, LLC, Accurate Settlement Group, LLC, Accurate Inspex, LLC, eMerge Property Solutions, LLC, and Arrowbase Technologies, Inc.

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.

We respect the privacy of children and comply with the practices established under the Children's Online Privacy Protection Act.² We do not knowingly collect or retain personally identifiable information from children.

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 completing 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

² Children's Online Privacy Act of 1998, 15 U.S.C. 6501-6505, as amended.

- 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
- Interaction 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 our websites and applications, and to provide you with our products and services.

IV. Use of the Information We Collect

We use 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 issues you might have 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 consistently 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 consistently 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. We may also use analytic software, such as Google Analytics, 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. Exemptions from State-specific Privacy Laws

Numerous states have adopted additional privacy requirements; however, in doing so many of these states have exempted financial institution or data subject to Title V of the Gramm-Leach-Bliley Act, 15 USC 6801 et seq. Accurate Group and its affiliates are “Financial Institutions” under the federal Gramm-Leach-Bliley Act (Public Law 106-102), and implementing regulations, e.g., the FTC Safeguard Rule, 15 U.S.C. §§ 6801–6809, and, therefore, are exempt under these state laws.

- California Consumer Protection Act (CCPA)³
- Colorado Consumer Privacy Act (“CPA”)⁴
- Connecticut’s Data Privacy Act (“CTDPA”)⁵
- Delaware Personal Data Privacy Act (“DPDPA”)⁶
- Indiana Consumer Data Privacy Act (“IDPA”)⁷
- Oregon Consumer Privacy Act (OCPA)⁸
- Texas Data Privacy and Security Act (“TDPSA”)⁹

³ California Consumer Protection Act (CCPA) Section 1798.145 (e) provides “This title shall not apply to personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (Public Law 106-102), and implementing regulations, or the California Financial Information Privacy Act (Division 1.4 (commencing with Section 4050) of the Financial Code).

⁴ Colo. Rev. State § 6-1-1304(2)(q). “This part 13 does not apply to... (q) A financial institution or an affiliate of a financial institution as defined by and that is subject to the federal “Gramm-Leach-Bliley Act”, 15 U.S.C. sec. 6801 et seq., as amended, and implementing regulations, including Regulation P, 12 CFR 1016.”

⁵ Connecticut’s Data Privacy Act (“CTDPA”), Conn. Gen. Stat. § 42-517(a) “The provisions of sections 42-515 to 42-525, inclusive, do not apply to any ... (5) financial institution or data subject to Title V of the Gramm-Leach-Bliley Act, 15 USC 6801 et seq.”

⁶ The DPDPA exempts financial institutions and their affiliates regulated by the Gramm Leach Bliley Act. Section 12D-103 (b) “This chapter does not apply to any of the following entities: ... (2) Any financial institution or affiliate of a financial institution, all as defined in 15 U.S.C. § 6809, to the extent that the financial institution or affiliate is subject to Title V of the Gramm Leach Bliley Act (15 U.S.C. § 6801, et seq., as amended) and the rules and implementing regulations promulgated thereunder.”

⁷ Under Indiana’s Consumer Data Privacy Act (“IDPA”), Indiana residents shall have, as of January 1, 2026, certain rights with respect to collection, use, and sharing of their personal data. Like other states’ privacy laws, the IDPA exempts financial institutions and their affiliates regulated by the Gramm Leach Bliley Act. Ind. Code § 24-15-1-1(b)(2). “This article does not apply to any of the following... (2) Any financial institutions and affiliates, or data subject to Title V of the federal Gramm-Leach-Bliley Act (15 U.S.C. 6801 et seq.).”

⁸ (2) Sections 1 to 9 of this 2023 Act do not apply to: ... (k) Information collected, processed, sold or disclosed under and in accordance with the following federal laws, all as in effect on the effective date of this 2023 Act: (A) The Gramm-Leach-Bliley Act, P.L. 106-102, and regulations adopted to implement that Act”.

⁹ The TDPSA exempts financial institutions and their affiliates regulated by the Gramm Leach Bliley Act. Texas Bus. & Comm. Code Sec. 541.002(b)(2).

- Utah Consumer Privacy Act (“UCPA”)¹⁰
- Virginia Consumer Data Protection Act (VaCDPA)¹¹

D. 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.

E. 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.

XII. Requests for 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 or toll free at 888-258-5757

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¹⁰ The UCPA exempts financial institutions and their affiliates that are “governed by, or personal data collected, processed, sold, or disclosed in accordance with, Title V of the Gramm-Leach-Bliley Act, 15 U.S.C. Sec. 6801 et seq., and related regulations”. UT Code § 13-61-102(2)(k).

¹¹ . The VaCDPA exempts financial institution or data subject to Title V of the federal Gramm Leach Bliley Act. Code of Virginia § 59.1-576 B “This chapter shall not apply to any … (ii) financial institution or data subject to Title V of the federal Gramm-Leach-Bliley Act (15 U.S.C. § 6801 et seq.)”.