



# NORTHWEST TITLE C O M P A N Y (a subsidiary for ET Investments)

## PRIVACY POLICY NOTICE

### Our Commitment to You

In order to better serve your needs now and in the future, we may ask you to provide us with certain pertinent information we may need for the handling of your transaction and/or service. We understand that you may be concerned about what we will do with such information – particularly any personal or financial information. We agree that you have a right to know how we will utilize the personal information you provide to us. We have therefore, adopted this Privacy Policy to govern the use and handling of your personal information.

### Our Privacy Policies and Practices Information

#### **we collect and sources from which we collect it:**

Depending upon the services you are utilizing, we may collect public and nonpublic personal information about you from the following sources:

- Information we receive from you or your representatives on applications or other forms.
- Information you or your representatives provide to us, whether in writing, in person, by telephone, electronically, or by any other means.
- Information about your transactions that we secure from our files or from our affiliates or others.
- Information that we receive from others involved in your transaction, such as the real estate agent, lender, or credit bureaus or from public records maintained by government agencies.
- Information obtained through our web site, as outlined below.

#### **Use of information:**

We request information from you solely for our own legitimate business purposes, and not for the benefit of any nonaffiliated party. The information collected is to provide services within a transaction involving you.

**Categories of the information collected** (See Page 2 referenced under section Right to know).

#### **Information Sharing:**

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. In the course of our general business practices, we may share and reserve the right to share the information we collect, as described above, about you or others as permitted by law to the following:

- Underwriters
- Notaries, signing
- Authorities
- Document delivery platforms

**WE DO NOT DISCLOSE ANY NONPUBLIC PERSONAL INFORMATION ABOUT YOU WITH ANYONE FOR ANY PURPOSE THAT IS NOT SPECIFICALLY PERMITTED BY LAW.**

#### **Security and Confidentiality of Your Information:**

Safekeeping of your non-public personal information is a high priority. We maintain physical safeguards, such as secure areas in buildings; electronic safeguards, such as passwords and encryption; and procedural safeguards, such as customer authentication procedures. We restrict access to nonpublic personal information about you to those who need to know that information in order to provide products or services to you. We carefully select and monitor outside service providers who have access to customer information, and we require them to keep it safe and secure. We do not allow them to use or share the information for any purpose other than to perform the service for which they are engaged. SMS Consent will not be shared. We train our employees with respect to security procedures and monitor compliance therewith. We will maintain appropriate facilities and systems to protect against unauthorized access to and corruption of the data we maintain.

### **Information Obtained Through Our Web Site**

We are sensitive to privacy issues on the Internet and believe it is important you know how we treat the information about you we receive on the Internet. In general, you can visit our website, without telling us who you are or revealing any information about yourself. Our web servers collect the domain names, not the e-mail addresses, of visitors. This information is aggregated to measure the number of visits, average time spent on the site, pages viewed, and similar information. We use this information to measure the use of our site and to develop ideas to improve the content of our site.

There are times, however, when we may need information from you, such as your name and e-mail address. When information is needed, we will use our best efforts to let you know at the time of collection how we will use the personal information. Usually, the personal information we collect is used only by us to respond to your inquiry, process an order, or allow you to access specific account/profile information. If you choose to share any personal information with us, we will only use it in accordance with the policies outlined above.

### **Cookies**

Our website may use “cookies” to improve the level of service to visitors. Cookies are lines of text that are transmitted to a web browser and stored on the visitor’s hard drive. When the visitor returns to the web site the cookie is transmitted back. Cookies provide a way for a server to recall a previous request or registration, or to keep track of a transaction as it progresses, thereby eliminating the need to repeat the information previously provided. A cookie can only be accessed from the web site that placed it on the visitor’s system. The cookies used by us do not collect personal identification information and we do not combine information collected through cookies with other personal information to determine a visitor’s identity or e-mail address. Cookies are commonly used on web sites today and should not harm any system upon which they are transmitted. Browsers can be configured to notify visitors when cookies are about to be received and provide visitors with the option of refusing cookies.

## **For California Residents**

### **Under the California Consumer Privacy Act of 2018 (“CCPA”) California residents have certain rights**

#### **Right to know**

You have a right to know the categories of information we are collecting, sources we are collecting the information from, the purpose of the information, how it will be used and when it ~~is~~ was disclosed over the past 12 months.

**Purpose Collected:** Each Category of information will be used in various combinations for the following purposes:

- To provide the services and products requested, including title and settlement services, evaluating the state of title of a property and identifying the liens and encumbrances affecting that property, to close loans, to record your deeds, mortgages and other instruments affecting title, make filings with government agencies, clearing title defects, to provide customer support to you and others involved in your transaction.
- To prevent fraud in transactions to find, prevent and respond to online and offline security issues, and for purposes of Identity verification
- For Government and regulatory compliance and reporting, to comply with relevant industry standards and best practices and ET policies.
- To maintain and supplement title plants, databases of prior policies, subdivision master searches and other resources, which may expedite future transactions affecting your property.
- To use and optimize our computer systems, understand how you use our online and web resources and improve our websites and apps and present their contents to you; while maintaining the integrity and security of our applications, websites and products.
- To provide you with email, text and video alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from the contracts entered into between you and us, and with others, including for billing and collections and handling of claims under a title policy.

- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, insureds, our customers, and others.
- To respond to law enforcement, regulatory and lender requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA and the Gramm-Leach-Bliley Act.
- To evaluate or conduct a merger, a divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets being transferred.

Category and Examples	From where do we get this information?
<p><u>Identifiers</u></p> <p><u>Such as your name, spouse’s name, maiden names, family member’s names, aliases, postal address, unique personal identifier, online identifiers, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers</u></p>	<ul style="list-style-type: none"> <li>• You, your family and agent</li> <li>• Your computer, tablet, and cell phone</li> <li>• Real estate agents and brokers involved in the transaction</li> <li>• Mortgage brokers, lenders and credit bureaus</li> <li>• Surveyors, appraisers, abstractors, title plants, title searchers</li> <li>• Lien searchers and clearance companies</li> </ul>
<p>Personal Information categories listed in Cal. Civ. Code §1798.80(e) such as your name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.</p>	<ul style="list-style-type: none"> <li>• You your family and agents</li> <li>• Your computer, tablet and cell phone</li> <li>• Real estate agents and brokers involved in the transaction</li> <li>• Mortgage brokers, lenders and credit bureaus</li> <li>• Surveyors, appraisers, abstractors, title plants, title searchers</li> <li>• Lien searchers and clearance companies</li> </ul>
<p>Protected classification characteristics under California or federal law including your age, race, color, marital status as such information appears in driver license and other identity documents and in loan application materials.</p>	<ul style="list-style-type: none"> <li>• You, your family and agents</li> <li>• Real estate agents and brokers involved in the transaction</li> <li>• Mortgage brokers, lenders and credit bureaus.</li> </ul>

Category and Examples	From where do we get this information?
Commercial information mostly in the form of real property records, mortgage records and lien records.	<ul style="list-style-type: none"> <li>• You, your family and agents</li> <li>• Your computer, tablet and cell phone</li> <li>• Real estate agents and brokers involved in the transaction</li> <li>• Mortgage Brokers, lenders and credit bureaus</li> <li>• Surveyors, appraisers, abstractors, title plants, title searchers</li> <li>• Lien Searchers and clearance companies</li> </ul>
Biometric information as contained in drivers licenses and identity documents; captured on security cameras in our offices; and as required for notarization and e-notarization in some states.	<ul style="list-style-type: none"> <li>• You, your family and agents</li> <li>• Notaries and others handling closing and signing functions</li> <li>• Your computer, tablet and cell phone</li> </ul>
Internet or other similar network activity such as information on how you interact with and use our websites, applications, emails, texts and other electronic resources.	<ul style="list-style-type: none"> <li>• You, your family and agents</li> <li>• Your computer, tablet and cell phone</li> </ul>
Geolocation data, primarily in the form of the location of your property and when and where someone may be meeting you for signatures, etc.	<ul style="list-style-type: none"> <li>• You, your family and agents</li> <li>• Real estate agents and brokers involved in the transaction</li> <li>• Mortgage brokers, lenders and credit bureaus</li> </ul>
Audio, electronic, visual, thermal, olfactory, or similar information. Should you choose to interact with us by phone, video link or come into our offices your voice or images may be recorded.	<ul style="list-style-type: none"> <li>• You, your family and agents</li> <li>• Your computer, tablet and cell phone</li> </ul>
Professional or employment-related information. Current or past job history is often a part of loan applications and statements of information.	<ul style="list-style-type: none"> <li>• You, your family and agents.</li> <li>• Mortgage brokers, lenders and credit bureaus.</li> </ul>
Inferences drawn from other personal information	<ul style="list-style-type: none"> <li>• You, your family and agents</li> <li>• Your computer, tablet and cell phone</li> <li>• Real estate agents and brokers involved in the transaction</li> <li>• Mortgage brokers, lenders and credit bureaus</li> <li>• Surveyors, appraisers, abstractors, title plants, title searchers</li> <li>• Lien searchers and clearance companies</li> </ul>

### **3rd Parties with whom information is shared; Disclosure of Personal Information for a Business Purpose**

ET INVESTMENTS DOES NOT SELL your information for monetary or other valuable consideration for marketing or any other purpose.

However, some of your information **does get shared**, and within the last 12 months has been shared with persons outside of the ET family of companies in order to better facilitate and complete your transactions and for other business and commercial purposes.

For example:

- ET Investments and their subsidiaries may order property searches and examinations from title searchers, abstractors and title plants.
- ET Investments and their subsidiaries may use third parties to obtain tax information, lien information, mortgage payoff information, condominium and homeowners' association information and payoff information.
- ET Investments and their subsidiaries may engage third parties to prepare documents in connection with your transaction.
- ET Investments and their subsidiaries may order surveys, appraisals, and inspections and/or communicate with those service providers. (Those services can't be ordered without providing basic information about the property involved, the parties, and/or the liens to those service providers.)
- Within the ET family of companies, we divide up the work to handle each closing most efficiently and to meet specific legal and licensing requirements. Certain parts of your closing (for example a search or disbursement) may be handled by another division or company within the ET family.
- When it is time for signatures, your complete closing package may be sent to a mobile notary, remote online notary, or notary service company who will arrange to meet with you to sign documents. The notary will, in turn, send signed copies back to us along with copies of your driver's license or other identity documents usually by mail, UPS, Federal Express or other courier service and sometimes by email or other electronic transmission.
- Your deed, mortgage and other documents required to perfect or clarify title will be recorded with the local recorder of deeds.
- WE may use an outside service to coordinate the recording or e-recording of those instruments, and they will receive copies of deeds, mortgages and other recordable documents to process, scan and send on to the recording office.
- Information and draft documents will pass back and forth between ET Investments, their subsidiaries and the lenders and mortgage brokers to facilitate your transaction.
- Information, including purchase agreements and amendments, will pass back and forth between ET Investments and their subsidiaries and the real estate agents and brokers, lenders, the mortgage brokers and others facilitating the transaction; and
- Various government agencies get involved. The law requires us to provide certain information to the IRS, the US Treasury, local and state tax authorities, recorders of deeds and other governmental agencies.
- In resolving claims and mitigating losses, we may engage outside counsel and other service providers (such as surveyors and appraisers) to assist in resolving the claim.
- From time to time, we are required to respond to law enforcement, regulatory and lender requests, and as required by applicable law, court order, or governmental regulations.

#### **Deletion rights:**

The consumer has the right to require ET Investments or their Affiliates to delete their personal information that has been collected with the following exceptions:

- If the personal information is still needed to complete a transaction for which the personal information was collected for
- Comply with legal or contractual obligations

**Verification Process:** You or your authorized representative may request in writing this information through the email address listed below. In order to insure we are protecting your personal information, we will match identifying information you supply to the information we have on file. Depending on the information requested, further verification action may be required.

**Right to Opt Out:** Under the CCPA law, you have the right to opt out of selling to third party affiliates. ET Investments does not sell your information to third party affiliates

**Right against discrimination:** CA residents have a right to exercise their rights under the CCPA laws and ET Investments will not discriminate against them for doing so.

**Contact for more information**

**If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us:**

Requests can be submitted by clicking [here](#) or call toll free at 1-833-341-0110. You can have an agent submit the request on your behalf with authorization signed by you stating that they may do so. Once verified the information will be sent to you via our secure platform within 45 days.