

American Digital Title Insurance Company

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 information 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 information.

This Policy applies to our processing of personal information 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 information.

In the context of this Policy, “processing” means any activity relating to personal information, 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 information 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.

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

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What types of personal information do we collect, where do we get it from, and why?

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

In all cases, we will collect personal information 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 information 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 information about you, whereas within the EEA and the U.K. we will seldom rely on consent as the lawful basis for processing personal information 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.
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	It is necessary for the purposes of our legitimate interests, or is based on your consent.	This data is used to offer products and services that may be of interest to you as permitted and subject to applicable law.

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<p>your purchasing history, employment and professional information, and inferences based on this information regarding your preferences.</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, www.americandigitaltitle.com, 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 our website quality.</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 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.</p>
<p>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</p>	<p>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</p>	<p>This data helps us to communicate with you and to ensure our compliance with regulations.</p>

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contact information, and not personal information.	us to comply with a legal obligation.	
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Use of Cookies, Data Collection Technologies, Data Analytics and Your Choices

Cookies and Online Data Collection Technologies. Cookies are pieces of information stored on your device through your web browser. Some cookies allow us to recognize your device and to collect information such as internet browser type, time spent on our Sites, pages visited and other activity and usage data (“Statistical / Range Measurement cookies”). We may use other online data collection technologies such a pixel tags, web beacons and clear GIFs which are embedded within our Sites to collect information about your use of our Sites and in HTML-formatted email messages to track when emails are viewed and forwarded and email response rates. We may also use the information for security purposes, to facilitate navigation, support security and performance of our Sites, manage content or personalize your experience while using our Sites.

Data Analytics. We only use a Statistical / Range Measurement cookie or other online data collection technology, and disclose information to our website data analytics service provider Adobe Analytics that is not traceable to your IP address or linked to your other personal information, to perform statistical analyses of use of our Sites if you provide your prior, affirmative authorization. To learn more about the use of data collection technologies by Adobe for analytics and to exercise choice regarding those technologies, please visit the [Adobe Analytics opt-out](#) page.

Your Choices. By default, the Statistics / Range Measurement cookie on our Site is disabled. When you first arrive on our website, you are presented with a banner of your Cookie Choices, which provides an explanation of how we use a Statistics / Range Measurement cookie, and you can change the default settings for the cookie if you wish to enable it.

You can opt out of receiving email marketing communications from us by using the “unsubscribe” link in any marketing email we send you. If you opt out of receiving marketing messages, we may still send you non-marketing communications regarding the services we provide to you.

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.

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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 information 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 information 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.

We do not disclose your personal information to nonaffiliated third parties for those third parties' direct marketing purposes, nor do we sell your personal information. 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 or legal protection for personal information, where an approved legal mechanism is in place to affect such transfers, or where you have provided your consent. For any transfers of personal information 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

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facilitate transfers of personal information 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 information and how long do we keep it?

We store personal information 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 retain the personal information we collect only as reasonably necessary for the purposes described in this Policy or otherwise disclosed to you at the time of collection. We will retain certain personal information for as long as it is necessary pursuant to our records retention guidelines. Our records retention guidelines are based on our legal or business needs including but not limited to the following criteria: legal and regulatory obligations and requirements; contractual requirements owed to third parties; operational, fiscal, administrative or historical value to business operations; the duration of our business relationship with you, your employer or another related entity; the possibility of future complaints; whether the record is part of an insurance or reinsurance transaction or claim file; audits; investigations or litigation or the likelihood of these; the possibility of future insurance or reinsurance claim activity; whether the documentation is needed for processing of financial records; statutes of limitations; health and safety requirements; tax requirements; personnel requirements; corporate governance requirements; and record-keeping requirements.

personal information personal information.

How is my personal information secured?

We have appropriate measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorized way. We limit access to personal information to those who have a business need for such access. Those individuals who process personal information 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 information 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 information is based on your consent, you have the right

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to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal information 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 information 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 us by automated means, in a commonly-used machine readable format.	Data protection legislation does not necessarily establish a general right to data portability. 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

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		<p>out by automated means (e.g. not for paper records). It affects only personal information that was “provided” by you. Hence, it does not, as a rule, apply to personal information that was created by us or obtained from other sources.</p> <p>For California Residents, please refer to the Additional Privacy Statement for California Residents below.</p>
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of personal information which we process about you. If it is found that personal information is inaccurate, you are entitled to have the inaccurate data removed, corrected, or completed, as appropriate.	This right only applies to personal information about you. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of personal information about you.	This right applies only if the processing of personal information about you is explicitly based on our so-called “legitimate interests” (see “ <i>basis of processing</i> ” above). Objections must be based on 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 information.
Right to have personal information erased	Subject to certain conditions, you are entitled, on certain grounds, to have your personal information 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 information 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.

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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.

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 information 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:

American Digital Title Insurance Company
Attention: Privacy
222 East 14th Street
Cincinnati, Ohio 45202
Toll-free: +1-855-706-8589
www.americandigitaltitle.com

by email at:

Privacy-MRDPUS@munichre.com

ADDITIONAL PRIVACY STATEMENT FOR CALIFORNIA RESIDENTS

This section supplements our Privacy Statement and provides specific information for residents of California (“consumers” in this section), and is intended to satisfy the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (collectively, referred to as “CPRA”). The CPRA requires that we provide certain information to California consumers about how we handle your Personal Information that we have collected, whether online or offline. Under the CPRA, “Personal Information” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household, including the categories of Personal Information identified in a table below to the extent they identify, relate to, describe, are reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household.

This section of our Privacy Statement applies to www.americandigitaltitle.com and other websites or applications that link to this Privacy Statement (the “Services”) and offline activities where California residents are directed to this section of our Privacy Statement. It does not apply to any third party websites or applications that you may access via the Services, which are governed by the privacy policies and terms of use that appear on those sites and applications.

If you are a California resident and would like to exercise your rights under the CPRA, please contact us using one of the methods below:
please contact us at:

American Digital Title Insurance Company
Attention: Privacy
222 East 14th Street
Cincinnati, Ohio 45202
Toll-free: +1-855-706-8589
www.americandigitaltitle.com

by email at:

Privacy-MRDPUS@munichre.com

Our CPRA Notice at Collection is found [below](#).

When We Are Acting as a Service Provider

In some circumstances, we act as a service provider under the CPRA and collect and use Personal Information on behalf of another unaffiliated company. Where your Personal Information is processed by us when acting as a service provider, the other company’s privacy policy will apply, and requests to exercise CPRA rights should be submitted directly to that company. In other circumstances, we act as a service provider for one of our own affiliated companies, and in that situation this section of the Policy will apply. If you make a request to exercise CPRA rights to us where we are acting as a service provider under the CPRA, we

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may be required to disclose your request to the company for which we are acting as a service provider.

Personal Information Not Covered by the CPRA

For purposes of this Additional Privacy Statement for California residents, the following Personal Information is not covered by the CPRA and does not include:

- Publicly information lawfully made available from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CPRA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

CALIFORNIA NOTICE AT COLLECTION

Categories of Personal Information Collected, Disclosed, Sources and Whether Sold or Shared

The type of information we collect from you depends on how you interact with us. The table below lists the categories of Personal Information that we have collected from California residents and have disclosed to others for a business purpose in the preceding twelve (12) months, the categories of sources of Personal Information from which the Personal Information is collected, and whether we sell or share each collected category of Personal Information. Some Personal Information included in the categories below may overlap with other categories.

We collect Personal Information from the following categories of sources and their representatives: our prospective and actual policyholders; other insured persons; corporate policyholders and companies we reinsure; reinsurance intermediaries of the companies we reinsure; claimants; others with information about the risk that we are insuring or reinsuring or about a claim; prospective and actual agents; our policyholders' agents; brokers; prospective and actual business partners, vendors, contractors and service providers; our affiliates; third party administrators; adjusters; investigators; third party data providers; consumers who access our internet websites, internet forms and applications; and from consumers in connection with research and outreach.

We may disclose for a business or commercial purpose each of the categories of Personal Information described in the table below to the following categories of parties: vendors and service providers, agents, brokers, regulators, auditors, counsel, consultants, reinsurers, retrocessionnaires, advisors, representatives, our affiliates and subsidiaries, other website

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users, business partners, advertising networks, banks, operating systems or platforms, law enforcement, government entities and courts.

Categories Collected & Disclosed in the last 12 months	Personal Information Examples	Collected	Categories of Sources	Disclosed for Business or Commercial Purpose	Sell or Share
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. Some identifiers included in this category may overlap with other categories.	Yes	From agents and brokers From our service providers	Yes	No – do not sell No – do not share.
Personal Records information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A 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, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	Yes	From agents and brokers From our service providers	Yes	No – do not sell No – do not share

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<p>Characteristics of Protected Classifications under California or federal law</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion, marital status, pregnancy, medical condition, physical or mental disability, sex, sexual orientation, and veteran or military status. Some protected classification characteristics included in this category may overlap with other categories.</p>	<p>Yes</p>	<p>From agents and brokers From our service providers</p>	<p>Yes</p>	<p>No – do not sell No – do not share</p>
<p>Commercial Information</p>	<p>Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Yes</p>	<p>From you directly From our service providers</p>	<p>Yes</p>	<p>No – do not sell No – do not share</p>
<p>Biometric Information</p>	<p>An individual’s physiological, biological or behavioral characteristics, including DNA information that can be used to establish individual identity. includes imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings from which an identifier template such as a faceprint, voiceprint can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data containing identifying information.</p>	<p>Yes</p>	<p>From you directly From our service providers</p>	<p>Yes</p>	<p>No – do not sell No – do not share</p>

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Internet or network activity information	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, information regarding a consumer's interaction with internet websites, applications, or advertisements.	Yes	From you directly automatically and from other sources if you provide prior affirmative, opt-in consent	Yes	No - do not sell No – do not share.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes and student disciplinary records.	Yes	From agents and brokers From our service providers	Yes	No – do not sell No – do not share
Geolocation Data	Physical location or movements.	Yes	From you directly and automatically From our service providers	Yes	No – do not sell No – do not share
Audio, Electronic, Visual, Thermal, Olfactory or similar information	Call recordings, video and photographs.	No		No	No – do not sell No – do not share

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Professional or employment-related information	Employment history, qualifications, licensing, performance evaluations and disciplinary record.	Yes	From you directly From our service providers	Yes	No – do not sell No – do not share
Inferences drawn from other Personal Information	Inferences drawn from any of the Personal Information described in this section about an individual to create a profile including inferences reflecting the individual's preferences, characteristics, behavior and abilities.	Yes	From you automatically and from other sources	Yes	No – do not sell No – do not share
Sensitive Personal Information	Social security number, driver's license number, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation (a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet); racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; genetic data; processing of biometric information for the purpose of uniquely identifying a consumer; Personal Information collected and	Yes	From you directly From agents and brokers From our corporate clients From our service providers	Yes	No – do not sell No – do not share

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	analyzed concerning a consumer's health; Personal Information collected and analyzed concerning a consumer's sex life or sexual orientation.				
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Business and Commercial Purposes for Which Personal Information is Collected and Used

The categories of Personal Information described above are collected and may be used and disclosed for the following business or commercial purposes:

- to provide you with, renew or modify products and services;
- to provide you with the information and documents you request and for other customer service purposes;
- to process claims and other legal actions;
- to provide you with information about our websites, mobile applications, or online services that link to our online Privacy Statement or required notices;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing, collections and payments;
- to deliver marketing communications or promotional materials that may be of interest to you and to assist us in determining relevant advertising;
- for advertising and marketing purposes, as well as underwriting and claims assessment and actuarial purposes, we may share your information with analytics service providers;
- to improve, enhance, and maintain the quality of services we provide and the usefulness of our websites, mobile applications and online services;
- to customize your experience and to analyze use of our websites, mobile applications and online services;
- to anonymize and aggregate data and reports to assess, develop and improve our products and services and for other analytics and research purposes;
- to comply with applicable laws;
- to respond to law enforcement requests, court orders or regulations, subpoenas, search warrants, other legal processes, or to perform other reporting obligations, as required by applicable law;
- to perform research, testing and product development and demonstrations;
- to prevent and detect fraudulent, malicious, deceptive, infringements of our policies and contracts and other potential misuse of or illegal activity relating to our products, services and assets;
- to carry out actuarial analysis and develop our actuarial and pricing models;
- to assist our affiliates in their everyday business purposes;
- to provide training or organize events;
- to investigate privacy, security or employment-related incidents;
- to refer you to our third-party partners as part of a referral program;

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- to conduct financial, tax and accounting audits, and audits and assessments of our business operations or security and financial controls;
- to plan, engage in due diligence for, and implement commercial transactions;
- for employment-related purposes including but not limited to recruiting, hiring, onboarding, performance reviews and staffing decisions; human resource management services; administration of employee benefits, compensation and expenses; maintenance of contact information; conducting healthcare-related services; and provide alerts and notices;
- to evaluate or conduct a merger, acquisition, restructuring, reorganization, divestiture, dissolution or other sale or transfer of some or all of our assets as a going concern or as part of bankruptcy, liquidation or similar proceeding;
- to secure our offices, premises and physical assets, including through the use of electronic access systems; and
- as described to you when collecting your Personal Information or as otherwise set forth in the CPRA.

We will not collect additional categories of Personal Information or use the Personal Information it collected for materially different, unrelated, or incompatible purposes without providing you notice.

Retention of Personal Information

Please refer to the section in our Privacy Policy above entitled “Where do we keep your personal information and for how long do we keep it?”

Deidentification of Personal Information

We may deidentify Personal Information and use it for our internal purposes. We commit to maintaining and using this information in deidentified form and will not attempt to reidentify the information, except to determine whether our deidentification process satisfies the CPRA.

Your Rights and Choices Regarding Your Personal Information

This section describes the specific rights California consumers have regarding their Personal Information under the CPRA, subject to certain exceptions, and how to exercise those rights:

Right to Know: You have the right to request from us, up to two (2) times per year and subject to certain exemptions, the Personal Information we have collected about you in the prior twelve (12) months including:

- the categories of Personal Information;
- the categories of sources from which we collect the Personal Information;
- our business or commercial purpose for collecting, selling, or sharing the Personal Information;
- the categories of third parties to whom we have disclosed the Personal Information; and

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- the specific pieces of Personal Information we have collected about you.

Right to Delete. You have the right to request deletion of Personal Information we have collected from you under certain circumstances, subject to certain exceptions.

Right to Correct. You have the right to request correction of inaccurate Personal Information we maintain about you, subject to certain limitations.

Right to Opt-Out of Sale or Sharing of Personal Information: If a business “sells” or “shares” Personal Information as those terms are defined under the CPRA, you have the right to opt-out of the sale or sharing of your Personal Information. As explained below, we do not and will not sell or share your Personal Information.

We do not “sell” your Personal Information under the CPRA because we do not disclose Personal Information to a third party for monetary or other valuable consideration. We only use Statistical / Range Measurement cookies, and disclose information to our website data analytics service provider that is not traceable to your IP address or linked to your other Personal Information, to perform statistical analyses of use of our website if you direct us to intentionally do so by providing your prior, affirmative authorization.

We do not “share” under the CPRA because we do not disclose your online identifiers such as cookie data for cross-contextual behavioral advertising purposes regarding our products and services.

Please review the “**Use of Cookies, Data Collection Technologies, Data Analytics and Your Choices**” section in our general **Privacy Policy** to learn more.

Right to Limit Use and Disclosure of Sensitive Personal Information. We do not use or disclose sensitive Personal Information other than for limited purposes permitted under the CPRA and, as such, are not required to offer a consumers a right to limit its use.

Right to Non-Discrimination. We will not discriminate against you for exercising any of your privacy rights under the CPRA.

Incentives

The CPRA imposes requirements on any financial incentives offered to California consumers related to their Personal Information. Businesses may offer different prices, rates, or quality of goods or services if the difference is reasonably related to the value of the consumer’s data.

How to Exercise Your Rights

If you are a California resident and would like to exercise your rights under the CPRA or you have any questions or comments about this Statement, please contact us using one of the methods below:

American Digital Title Insurance Company

American Digital Title Insurance Company
Attention: Privacy
222 East 14th Street
Cincinnati, Ohio 45202
Toll-free: +1-855-706-8589
www.americandigitaltitle.com

by email at:

Privacy-MRDPUUS@munichre.com

Authorized Agent. You may designate an authorized agent to submit requests and act on your behalf. We require authorized agents to provide proof of their authorization from you.

Identity Verification. We will validate your identity and the identify of anyone making a request on your behalf relating to your Personal Information. The information we request to verify your identity may vary depending on the type of request and your relationship with us. Where feasible, we will match the identifying information you provide to the Personal Information we already maintain about you. We may in some instances request additional Personal Information from you which we will use only to verify your identity and will delete as soon as practical after responding to your request, except if we need to retain it to comply with CPRA recordkeeping requirements. If we are unable to verify your identity after a good faith attempt, we may deny your request and we will explain the reason for the denial.

We will respond to your request within the period of time required under law and will notify you if it is reasonably necessary for us to extend our response time.