

# **Privacy Notice**

This Privacy Notice describes how Wisconsin Title Service Co Inc and Wisconsin Title Closing Service Inc and its subsidiaries and affiliates (together referred to as "Wisconsin Title," "we," "us," or "our") collect, use, store, and share your information. This Privacy Notice applies to information we receive from you offline only, as well as from third parties, when you interact with us and/or use and access our services and products ("Products"). The practices described in this Privacy Notice are subject to applicable laws in the places in which we operate.

## What Type Of Information Do We Collect About You?

Depending upon how you interact with our Websites, Applications, or Products, how you communicate with us, or our interactions with third parties, we may collect the following categories of information from and about you:

- Direct identifiers, including but not limited to your unique online identifier, name, alias, social media handle, IP address, username and password, postal and/or e-mail address, account name and/or account number, social security number, driver's license number, passport number, and/or state identification number.
- **Related identifiers**, including but not limited to your date of birth, bank, credit, or debit card number, financial information, insurance policy number, and/or license plate information.
- **Physical characteristics**, including protected characteristics under federal and state law, such as age, sex, race, and ethnicity.
- **Commercial information**, including records of products or services purchased, obtained, or considered, and other purchasing and consuming histories and tendencies.
- Internet or other electronic network activity information, with our Websites, Applications, and communications, and including browser type and version, browser settings, operating systems and platform, device type, operating information, mobile carrier, and page response time and download errors.
- **Geolocation data**, such as your zip code and time zone.
- Audio, electronic, visual, and thermal information, including telephone recordings, electronic
  communication records, security camera footage from applicable Wisconsin Title properties, and
  temperature reading.
- Professional or employment-related information, such as your work history, salary history, and education history.

## **How Do We Collect Your Information?**

We collect your information: (1) directly from you; (2) automatically when you interact with us; and (3) from third parties, including business parties and affiliates.

# How Do We Use Your Information?

We use the information outlined in <u>What Type of Information Do We Collect About You</u> for a variety of business and commercial purposes, including but not limited to:

- Provide the Applications and Websites to you;
- Provide the Products you have requested;
- Operate the Applications and Websites, including access management, payment processing, Application
  and/or Website administration, internal operations, troubleshooting, data analysis, testing, research, and
  for statistical purposes;
- Respond to your requests, feedback, or inquiries;
- Comply with laws, regulations, and other legal requirements;
- Comply with relevant industry standards and our policies;
- Protect and enforce your rights and the rights of other users against unlawful activity, including identity theft and fraud;
- Protect and enforce our collective rights arising under any agreements entered between Wisconsin Title
  and you or any other third party;
- Fulfill a transaction you requested or service your policy;
- Handle a claim;
- Create and manage your account;
- Protect the integrity and maintain security of our Applications, Websites, and Products;
- Operate, evaluate, and improve our business; and
- Provide you with information and advertisements about products, services, and promotions, from us or affiliates that may interest you.
- Deliver content tailored to your interests and the manner in which you use the Applications and/or Websites;
- Present content in a manner that is optimized for your device;
- Measure and analyze the effectiveness of the Applications, Websites, and Products we provide to you.

### How Do We Share Your Information?

We do not sell your personal information. We only share your information, including to subsidiaries, affiliates, and to unaffiliated third parties: (1) with your consent; (2) in a business transfer; (3) to service providers; and (4) for legal process and protection.

### How Do We Store and Protect Your Information?

The security of your information is important to us. That is why we take commercially reasonable steps to make sure your information is protected. We use our best efforts to maintain commercially reasonable technical, organizational, and physical safeguards, consistent with applicable law, to protect your information.

## How Long Do We Keep Your Information?

We keep your 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. If we dispose of your information, we will do so in a way that is secure and appropriate to the nature of the information subject to disposal.

## **Your Choices**

We provide you the ability to exercise certain controls and choices regarding our collection, use, storage, and sharing of your information. Please note that for some of these rights, such as the Right to Know and Right to Delete, we will verify your identity before we respond to your request. To verify your identity, we will generally match the identifying information provided in your request with the information we have on file about you. Depending on the sensitivity of the personal information requested to be deleted, we may also utilize more stringent verification methods to verify your identity, including but not limited to requesting additional information from you and/or requiring you to sign a declaration under penalty of perjury.

### International Jurisdictions:

Our Products are offered in the United States of America (US), and are subject to US federal, state, and local law. If you are accessing the Products from another country, please be advised that you may be transferring your information to us in the US, and you consent to that transfer and use of your information in accordance with this Privacy Notice. You also agree to abide by the applicable laws of applicable US federal, state, and local laws concerning your use of the Products, and your agreements with us.

# **Changes to our Privacy Policy**

We may change this Privacy Notice from time to time. Any and all changes to this Privacy Notice will be reflected on this page, and where appropriate provided in person or by another electronic method. YOUR CONTINUED USE, ACCESS, OR INTERACTION WITH OUR PRODUCTS OR YOUR CONTINUED COMMUNICATIONS WITH US AFTER THIS NOTICE HAS BEEN PROVIDED TO YOU WILL REPRESENT THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY NOTICE.

### For California Residents

If you are a California resident, you may have certain rights under California law, including but not limited to the California Consumer Privacy Act of 2018 ("CCPA"). All phrases used in this section shall have the same meaning as those phrases are used under California law, including the CCPA.

<u>Right to Know.</u> You have a right to request that we disclose the following information to you: (1) the categories of personal information we have collected about or from you; (2) the categories of sources from which the personal information was collected; (3) the business or commercial purpose for such collection and/or disclosure; (4) the categories of third parties with whom we have shared your personal information; and (5) the specific pieces of your personal information we have collected. To submit a verified request for this information, contact Wisconsin Title Service at 262-542-1700, 1716 Paramount Dr, P O Box 618, Waukesha WI 53187-0618. ATTN: Compliance Manager.

<u>Right of Deletion</u>. You also have a right to request that we delete the personal information we have collected from and about you. This right is subject to certain exceptions available under the CCPA and other applicable law. To submit a verified request for deletion, contact Wisconsin Title Service at 262-542-1700, 1716 Paramount Dr, P O Box 618, Waukesha WI 53187-0618. ATTN: Compliance Manager.

<u>Verification Process</u>. For either a request to know or delete, we will verify your identity before responding to your request. To verify your identity, we will generally match the identifying information provided in your request with the information we have on file about you. Depending on the sensitivity of the information requested, we may also utilize more stringent verification methods to verify your identity, including but not limited to requesting additional information from you and/or requiring you to sign a declaration under penalty of perjury.

<u>Notice of Sale</u>. We do not sell California resident information, nor have we sold California resident information in the past 12 months. We have no actual knowledge of selling the information of minors under the age of 16.

<u>Right of Non-Discrimination</u>. You have a right to exercise your rights under California law, including under the CCPA, without suffering discrimination. Accordingly, Wisconsin Title will not discriminate against you in any way if you choose to exercise your rights under the CCPA.

Notice of Collection. To learn more about the categories of personal information we have collected about California residents over the last 12 months, please see "What Information Do We Collect About You" "How Do We Collect Your Information", "How Do We Use Your Information", and "How Do We Share Your Information" as described elsewhere in this policy

Notice of Sale. We have not sold the personal information of California residents in the past 12 months.

<u>Notice of Disclosure</u>. To learn more about the categories of personal information we may have disclosed about California residents in the past 12 months, please see "How Do We Use Your Information" and "How Do We Share Your Information" as described elsewhere in this policy.



