

# Privacy Policy

## Introduction

It is our goal to respect the privacy of each user of this website (referred to herein as “you” or “user”). This Privacy Statement (“Policy”) describes how information is collected, used, and disclosed by Clever Title, LLC, Clever Settlement Services, LLC, Clever Escrow, Inc., Clever Title Ohio, LLC, and Clever Closings West Coast, LLC (collectively, “Clever Closings”), when you use our websites, mobile applications, and other online products and services (collectively, “Services”) or otherwise interact with us.

BY REGISTERING FOR OR USING THIS WEBSITE, YOU ACCEPT AND AGREE TO BE BOUND BY THIS POLICY. IF YOU DO NOT AGREE TO THIS POLICY, YOU CEASE AND DESIST ALL USE OF THIS WEBSITE IMMEDIATELY. Clever Closings reserves the right to modify this Policy from time to time by posting a notice on the Website's home page or any other reasonable means. Your use of the Website after the date of the last modification listed at the beginning of this Policy indicates acceptance of, and agreement to, any changes made.

## Information You Provide to Us

When using this Website, you may be asked to provide personal information about yourself, including but not limited to your name, contact information (e.g., email address, physical address, telephone number), details about your home transaction (e.g., address, sales price, etc.), and in some cases self-reported financial information (e.g. loan amount, etc.). You may also provide information about a third party through the Website or through other mediums, for example, if you share information on behalf of a friend or relative regarding a title order. We may combine information that you provide to us directly with other information we collect from your interaction with the Website or from other companies, including information collected by our affiliate, Clever Real Estate, Inc. (“Clever”). Clever Closings may collect and store any such information for its own internal use and purposes, including but not limited to providing such information to any of its partners (including Clever) in providing the services referenced on this Website.

## Automatically Collected Information

Pages on this Website may also include web beacons or pixels, which are used to count visits to individual pages of the website, to track activity over time, to track whether and how users have interacted with emails we send, or to gather other information about your devices or your interactions with the Website. Information collected this way may be combined with other information you provide or that Clever Closings collects about you, which may include but is not limited to your individual browser, device type, login information, access times, operating system, Internet Service Provider, or IP address. You may determine what information Clever Closings accesses from a mobile device or mobile browser by adjusting the related settings on your device. Refer to your device or mobile service provider's instructions for details about how to accomplish this.

For devices that enable location services, Clever Closings may collect the location of your device, which may be used to provide you information and advertising based on your location. This feature can be deactivated by disabling location services on your device.

Clever Closings uses multiple technologies to track phone calls and text messages made between you and the Company's representatives so that we can record when you communicated with us, access certain details about your inquiries and communications, and provide better customer service. As part of this process, Clever Closings will receive in real time and store data about your call or text message, including the date and time of the call or text message, your phone number, and the contents of the text message.

This Website may include Social Media Features, such as the Facebook Like button, the Twitter Tweet button and other social sharing buttons or interactive mini-programs. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on this Website. Your interactions with these features are governed by the privacy policy of the company providing the same.

A cookie is a small data file, often including an anonymous unique identifier that is sent from a web Website's computer and stored on your computer's hard drive. Use of cookies is common on the Internet. A web Website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser permits a web Website to access only the cookies it has already sent to you, not the cookies sent to you by other Websites. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.) You can reset your browser to refuse all cookies or indicate when a cookie

is being sent. But if you refuse cookies, some parts of the Website may not function properly and may not provide services or information you have requested.

Third Parties, with whom we partner to provide certain features on this Website, provide services, or to display advertising based upon your Web browsing activity, may also use, collect, and store information.

## Use of Information

You expressly consent to Clever Closings' use of the information provided on this Website to:

(A) Provide, improve, and maintain our services and provide you with the services that you request;

(B) Provide you with periodic industry updates, if you so choose;

(C) Answer your questions or complaints and provide better customer service;

(D) Refer you our partners or sales associates who may provide you with services

(E) Communicate with you about our Services and any other events, news or information about Clever Closings and its partners, including Clever;

(F) Monitor and analyze trends, usage, and activities in connection with our Services;

(G) Personalize and improve the Services and provide content, features, or advertisements that match your interests and preferences; and

(H) Link or combine with other information we get from third parties to help understand your needs and provide you with better service.

(I) Communicate directly with you, including autodialed phone calls, text messages, and prerecorded messages from Clever Closings and its partners (including Clever), on any landline or cell phone number provided to Clever Closings, even if such number is on a Do Not Call list and even if charges are incurred for the call or text. You understand that consent to receiving such communications is not a condition of receiving Clever Closings's services and that you can call 1-888-800-4128 for services should you choose not to receive such communications.

Clever Closings' partners may use cookies, web beacons, SDKs, and other technologies to identify your device when you use this Website. We use Google Analytics and other such tracking mechanisms to collect information about the use of this Website. More information on Google Analytics — including how you can control the information sent to Google — can be found here:

[www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

Users may provide some Personal Information directly to Agents who are providing Services. Agents are third parties who are not our contractors, employees or agents, and we do not supervise, direct, or control any Agent's provision of Services. Accordingly, while Agents are contractually obligated to comply with this policy in their storage, use and disclosure of any Personal Information that you provide to them, we do not guarantee that Agents will always comply with their obligations.

The Website is hosted by servers in the United States. If you are located outside of the United States, the Information you provide will be transferred to the United States. By submitting the Information, you consent to its transfer to the United States and to its storage, processing, and use there in accordance with this Policy.

## Sharing Your Information

By using this Website, you agree that we may share the Information you provide with our affiliated companies (including but not limited to Clever) and partners, as permitted by law, in order to fulfill our commitment of providing you with the Services referenced on the Website. We may share the Information you provide under the following circumstances:

(A) Third party vendors we engage to provide services on our behalf, such as hosting, web-Website development, and support, have access to the Information, but have agreed not to the Information or to use it for any purpose other than providing the requested services.

(B) To enforce this Privacy Statement or any other part of our terms and conditions to protect our property or rights;

(C) To protect the safety of anyone;

(D) To investigate, prevent, or take action regarding illegal or improper activities;

(E) To carry out a merger or consolidation with another entity, a sale or transfer of some or all of our assets, or any similar transaction;

(F) For other reasons we determine in good faith are necessary, appropriate, or required by law, such as when we respond to subpoenas, court orders, or other legal or administrative process;

(G) Upon obtaining your consent to do so.

This Website contains links to third-party web Websites, including our partners and advertisers. If you hold your mouse over a link, it will indicate whether clicking the link will send you off our Website. When you click on those links, you will go to a third-party Website where you will be subject to that Website's privacy statement and we encourage you to read that policy statement. Clever Closings shall not be responsible for the privacy practices of any other Websites and we expressly disclaim any liability for their actions, including actions relating to the use and disclosure of Information by those third parties. We do not sell your personal information to third parties. Clever Closings may also share aggregated or anonymized information that does not directly identify you.

## Security

Clever Closings's Website hosting service provider maintains its systems in accordance with reasonable industry standards to reasonably secure the information of Clever Closings and Users of this Website. No data transmission over the Internet, however, can be guaranteed to be 100% secure. You agree to use this Website at your own risk. If you have questions about security on our Web site, you can contact us at [contact@cleverClosingsservices.com](mailto:contact@cleverClosingsservices.com)

## If Your Information Changes

If your Information changes or if you no longer wish to use the Website, you may correct or update your Information or unsubscribe from any industry updates you have requested by modifying or deleting your profile on the Website, writing to customer service at:

Clever Closings  
15305 Dallas Parkway  
12th Floor, Office No. 1267

Addison, TX 75011

or by emailing: [contact@cleverclosings.com](mailto:contact@cleverclosings.com)

## California Law

Under California law, California residents have the right to request in writing from businesses with whom they have an established business relationship (1) a list of categories of personal information, such as name, address, e-mail address, and the type of services provided to the customer, that a business has disclosed to third parties [including affiliates that are separate legal entities] during the immediately preceding calendar year for the third parties' direct marketing purposes and (2) the names and addresses of all such third parties. To request the above information please contact us by writing to the contact address below.

## Contact Us

If you have any questions or concerns about this Policy, please contact us at

Clever Closings  
15305 Dallas Parkway  
12th Floor, Office No. 1267  
Addison, TX 75011

or by emailing [contact@cleverclosings.com](mailto:contact@cleverclosings.com)