

Example URL:

Boston National Title

Online Privacy Notice and Notice at Collection

Last updated: July 1, 2023

We at Boston National Title Agency, LLC, including our subsidiaries such as the Closer, LLC, (collectively “BNT”) respect your concerns about privacy and the privacy of information our clients provide to us. This Online Privacy Notice describes the types of personal information we obtain, how we may use the information, with whom we may share it and the choices you may have regarding our use of the information. We also describe the measures we take to safeguard the information and tell you how to contact us about our privacy practices.

This Online Privacy Notice applies to personal information we obtain through this website and other sites, applications and other data collection points that link to this Online Privacy Notice (collectively, the “Site”). Other privacy principles or policies could apply depending on how you interact with us, the financial products or services you may ultimately obtain from us, or the jurisdiction in which we are doing business with you.

Information We Obtain

We may obtain the following types of personal information when you choose to provide it through our Site:

- contact information, such as your name, telephone number, postal address and email address;
- when you register for an online account, which may include information about your lender and loan amount;
- login credentials, such as your username and password;
- information about your interest in or application for an employment opportunity; and
- any other personal information in content you provide on our Site.

In addition, when you visit our Site, we may collect certain information by automated means, such as cookies and web beacons. The information we obtain in this manner may include IP address, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our site, and dates and times of website visits. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon”, also known as an Internet tag, pixel tag or clear GIF, is a tiny graphic image that may be used on our Site. Through these automated collection methods, we obtain “clickstream data,” which is a log of content on which a visitor clicks while browsing a website. As the visitor clicks through the website, a record of the action may be collected and stored. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our Site.

Sources of Personal Information

We may have obtained personal information about you from various sources, including as described below:

- Directly from you, such as when you provide the information, connect to us via social media, or send us questions, requests or comments
- From your devices, such as when you visit our Site
- Your family or friends, such as when they provide us with your contact information
- Our affiliates
- Vendors who provide services on our behalf (such as data analytics and lead providers)
- Social media networks
- Business partners (such as loan officers and brokers)
- Consumer data resellers
- Public databases

How We Use The Information We Obtain

We use the information we obtain through the Site to:

- create and manage your account;
- provide products and services that you requested or were requested on your behalf;
- display content on our Site;
- respond to and communicate with you about your requests, questions and comments;
- to ensure the proper competition of services for our clients.
- operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of our sales, analyzing and enhancing our products, services and Site; and performing accounting, auditing, billing, reconciliation and collection activities);
- perform data analyses and other processing (including market and consumer research, trend analysis, financial analysis, anonymization, encryption and tokenization of personal information);
- manage career opportunities;
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards and our policies.

In addition, we may use information collected online through cookies, web beacons and other automated means for purposes such as (i) customizing our users' visits to our Site, (ii) delivering content (including advertising) tailored to our users' interests and the manner in which our users browse our Site, and (iii) managing our business. We also use this information to help diagnose technical and service problems, administer our Site, and identify users of our Site. We use clickstream data to determine how much time users spend on web pages of our Site, how

users navigate through our Site, and how we may tailor our Site to better meet the needs of our users.

We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

Third-Party Analytics Services

We may use third-party web analytics services on our Site, such as those of Google Analytics. The analytics providers that administer these services use technologies such as cookies, web beacons and web server logs to help us analyze your use of the Site. To learn more about Google Analytics and how to opt out, please visit google.com/intl/en/analytics/learn/privacy.html or support.google.com/analytics/answer/181881?hl=en.

Our Site is not designed to respond to “do not track” signals received from browsers.

Information We Share

We do not sell or otherwise share personal information about you, except as described in this Online Privacy Notice. We share personal information with third parties who perform services on our behalf. These third parties are not authorized by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) in response to requests by government agencies, such as law enforcement authorities, (iii) for the purpose of or in connection with legal proceedings, or otherwise for the purpose of establishing, exercising or defending our legal rights or (iv) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Your Choices

We may offer you certain choices about how we communicate with you and what information we collect from you. To update your preferences, ask us to remove your information from our email or call marketing lists or submit a request, please contact us as indicated in the [How To Contact Us](#) section of this Online Privacy Notice.

Please note that if you ask to be removed from a mailing list, we may still contact you regarding specific services or transactions we are performing on your behalf.

Links To Other Websites

Our Site may contain links to other websites for your convenience and information. These websites may be operated by companies not affiliated with Boston National Title. Linked websites typically have their own privacy policies or notices, which we strongly suggest you review if you visit any linked websites. We are not responsible for the content of any websites that are not affiliated with Boston National Title, any use of those websites, or the privacy practices of those websites.

How We Protect Personal Information

We maintain administrative, technical and physical safeguards reasonably designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

How We Retain Personal Information

We retain your personal information for as long as reasonably necessary to fulfill the business purposes that we describe in this privacy policy, unless a longer retention period is required or permitted by law.

Children's Personal Information

Our Site is designed for a general audience and is not directed to children. We do not knowingly collect or solicit personal information from children under the age of thirteen (13) through our Site. If we become aware that we have collected personal information from a child under thirteen (13), we will promptly delete the information from our records. If you believe a child under thirteen (13) may have provided us with personal information, please contact us as specified in the [How to Contact Us](#) section of this Online Privacy Notice.

Updates To Our Online Privacy Notice

This Online Privacy Notice will be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on our Site to notify you of any significant changes to our Online Privacy Notice and indicate at the top of the notice when it was most recently updated.

How To Contact Us

If you have any questions about this Online Privacy Notice, or if you would like us to update information we have about you or your preferences, please [contact us](#), call 877.569.6547, or write to us at:

Chief Compliance Officer
Essent Guaranty, Inc.
Two Radnor Corporate Center, 3rd Floor
100 Matsonford Road
Radnor, PA 19087

State Privacy Rights Addendum

Effective Date: January 1, 2023

Last Updated: July 1, 2023

This State Privacy Rights Addendum (“Addendum”) supplements the BNT Online Privacy Notice and applies solely to the personal information of California, Virginia, Colorado and Connecticut consumers collected by BNT. This Statement does not apply to the BNT personnel, applicants, or B2B personnel, or to information collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. In addition, this Statement does not apply to personal information BNT processes as a service provider to another entity.

This Addendum is intended to address the relevant notice requirements of the following state privacy laws:

- California Privacy Rights Act and its implementing regulations (the “CPRA”)
- Virginia Consumer Data Protection Act (“VCDPA”)
- Colorado Privacy Act (“CPA”)
- Connecticut Data Privacy Act (“CDPA”)

Certain terms used herein have the meaning given to them in the CPRA, VCDPA, CPA and CDPA. Nothing in this Addendum is intended to contradict or limit the applicability of the information provided in our Privacy Policy.

1. Notice of Collection and Use of Personal Information

We may collect the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology); telephone number, online identifier, internet protocol address, email address, Social Security number, driver’s license number, passport number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status

- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- **Geolocation Data:** Information about your location, such as your physical location.
- **Sensory Information:** audio, electronic, visual or similar information
- **Employment Information:** professional or employment-related information
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

We may use your personal information for the purposes described in our Online Privacy Notice. In addition, we may use your personal information for certain business purposes specified in state privacy laws, including as described below:

- **Performing Services:** Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services
- **Auditing:** Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance
- **Short Term Use:** Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction
- **Security Purposes:** Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity
- **Debugging:** Debugging to identify and repair errors that impair existing intended functionality
- **Undertaking Internal Research:** Undertaking internal research for technological development and demonstration
- **Undertaking Other Activities:** Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us

2. Our Prior Collection, Use and Disclosure of Personal Information

We may have collected and used your personal information, as described in section 1 above, during the 12-month period prior to the effective date of this Addendum. For the personal information collected during that timeframe, we describe below information regarding our disclosure of personal information with third parties.

Disclosure of Personal Information for Specific Business Purposes

We may have disclosed your personal information with certain categories of third parties, including as described in our Online Privacy Notice and below, including for the business purposes described above.

Categories of Third Parties	Categories of Personal Information
Our affiliates	<ul style="list-style-type: none"> ◇ - Identifiers ◇ - Additional Data Subject to Cal. Law ◇ - Protected Classifications ◇ - Commercial Information ◇ - Online Activity ◇ – Geolocation Data ◇ - Sensory Information ◇ - Employment Information ◇ – Inferences ◇ – Sensitive Personal Information
Third-party vendors who provide services on our behalf (such as data analytics providers)	<ul style="list-style-type: none"> ◇ - Identifiers ◇ - Additional Data Subject to Cal. Law ◇ - Protected Classifications ◇ - Commercial Information ◇ - Online Activity ◇ - Sensory Information ◇ - Employment Information ◇ – Inferences ◇ – Sensitive Personal Information

<p>Corporate business partners (such as parties involved in a transfer of our assets)</p>	<ul style="list-style-type: none"> ◇ - Identifiers ◇ - Additional Data Subject to Cal. Law ◇ - Protected Classifications ◇ - Commercial Information ◇ - Online Activity ◇ - Sensory Information ◇ - Employment Information ◇ – Inferences ◇ – Sensitive Personal Information
<p>Professional services organization, such as auditors and law firms</p>	<ul style="list-style-type: none"> ◇ - Identifiers ◇ - Additional Data Subject to Cal. Law ◇ - Protected Classifications ◇ - Employment Information ◇ – Sensitive Personal Information
<p>Social Networks</p>	<ul style="list-style-type: none"> ◇ - Identifiers ◇ - Online Activity
<p>Law enforcement agencies and government entities, as described in our Online Privacy Notice</p>	<ul style="list-style-type: none"> ◇ - Identifiers ◇ - Additional Data Subject to Cal. Law ◇ - Protected Classifications ◇ - Commercial Information ◇ - Online Activity

- ◇ - Sensory Information
- ◇ - Employment Information
- ◇ – Inferences
- ◇ – Sensitive Personal Information

We do not sell your personal information in exchange for money or other valuable consideration. We do not have actual knowledge that we sell personal information of minors under 16 years of age.

3. State Law Privacy Rights

You have certain choices regarding your personal information, as described below.

- **Request to Know/Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed and sold about you. To submit a request to know/access, please [contact us](#) or call 877.569.6547.
- **Request to Delete:** You have the right to request that we delete certain personal information we have collected from you, subject to certain exceptions under applicable law. To submit a request to delete, please [contact us](#) or call 877.569.6547.
- **Do Not Sell or Share My Personal Information:** We do not sell your personal information or share it for cross-context behavioral advertising.
- **Request to Correct:** You have the right to request that we correct your personal information if you believe it is inaccurate. To submit a request to correct, please [contact us](#) or call 877.569.6547.
- **Opt out of the sale of personal information:** We do not sell your personal information for money.
- **Opt out of targeted advertising:** We do not process your personal information for targeted advertising.
- **Opt out of profiling:** We do not use automated processes to evaluate or predict personal aspects of your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements in order to make decisions about whether to provide you with financial and lending services, housing, insurance, education enrollment, criminal justice, employment opportunities, health care services, or access to basic necessities, such as food and water.
- **Limit the Use of My Sensitive Personal Information:** Sensitive personal information may include the following: social security number, driver’s license, 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, racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of a mail, email, and text

messages, genetic data, biometric data, health information, and information concerning sex life or sexual orientation.

While we do collect, use, and share your sensitive personal information, we only do so for the following business purposes:

- Purposes covered under the GLBA such as funding and servicing loans
- Helping to ensure security and integrity of our systems and information
- Short-term, transient use
- Performing services for you on behalf of the business, including maintaining or servicing accounts, providing customer service, and financing

California, Virginia, Colorado and Connecticut law each provides its residents a right to opt-out of or consent to the processing of sensitive personal information in certain circumstances. Each of the limited business purposes for which we process your sensitive personal information are exempt from this opt-out or consent right.

- **Shine the Light Request:** Subject to certain limitations under California Civil Code § 1798.83, you may have the right to request that we provide you with (a) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (b) the identity of those third parties. To submit a Shine the Light request, please [contact us](#) or call 877.569.6547.

Authorized Agents. To submit a request as an authorized agent on behalf of a consumer, please [contact us](#) or call 877.569.6547.

Verifying Requests. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. In addition, if you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

Additional Information. If you choose to exercise any of your rights, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. This Statement is available in alternative formats upon request by [contacting us](#) or calling 877.569.6547.

Appeal. If we deny your request to exercise one of your privacy rights, you have the right to appeal our decision. We will respond to your appeal within 60 days with any actions we take in response and an explanation of our decision. To submit an appeal, please call 877.569.6547, or write to us at:

Chief Compliance Officer
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