

PRIVACY NOTICE

Last Updated: 06/21/2021

Purpose of This Notice

At SUMMIT we are committed to providing our clients with financial products and services to meet their needs. Our commitment includes protecting personally identifiable information we obtain about you. This Privacy Notice (“**Notice**”) describes how we collect, use, disclose and protect Personal Information (as defined below) that SUMMIT., and its parent companies, subsidiaries, affiliates, and divisions (“SUMMIT,” “we,” “us,” or “our”) collect about you. This Notice applies to any party whom we receive Personal Information from or about, including, but not limited to our clients, our clients’ consumers, vendors and users of this website and our mobile applications (collectively, “**Sites**”) that display or link to this Notice. By using our Sites, you consent to the collection, use and disclosure of your Personal Information in compliance with this Notice and subject to the applicable state and federal laws of the United States.

Privacy for Other Websites

Our Sites may contain links to the websites of non-affiliated companies. SUMMIT is not, however, responsible for the privacy practices or the content of these websites. We recommend that you review the privacy notice of each linked website that you visit.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked to a particular consumer or device (also known as “**Personal Information**”). In particular, we may receive and/or obtain the following types of Personal Information: (i) contact information such as name, address, phone number, email address; (ii) demographic information such as date of birth, gender, marital status; (iii) government ID numbers such as social security number (SSN), driver’s license, passport; (iv) financial account information; (v) responses to any surveys you complete in relation to or regarding your experience with our products or services; and/or (vi) any other information collected in the ordinary course of business in order to provide our products and/or services.

We also collect browsing information from your Internet browser, computer, and/or mobile device if you visit or use our Sites, including, but not limited to, Internet Protocol (IP) address or device ID/UDID, protocol and sequence information, browser language and type, domain name system requests, browsing history (such as time spent at a domain, time and date of your visit and number of clicks), http headers, application client and service banners and operating system data (collectively, “**Browsing Information**”).

How Information is Collected

We obtain the types of Personal Information listed above from the following sources:

- directly from you when you complete forms and applications in connection with the products and services we provide, use our products and services or otherwise interact with us and our Sites;
- from our clients (i.e., lenders) when they provide us with information collected about you in connection with forms and applications completed by you or our clients on your behalf, products and services ordered by our clients on your behalf or other correspondence and communications between us and our clients related to your transaction; and
- directly from any affiliates and third-party service providers performing services for us in relation to your transaction.

We may collect Browsing Information from the use of cookies and similar technologies. Please note that third-party ad networks and service providers may collect Browsing Information and use and disclose such information for their own purposes, subject to their privacy notices. You have the choice to set your browser to accept or reject cookies. Please consult the “Help” menu or other appropriate tool of your browser to learn how to change your cookie preferences.

We may also receive information about you from third parties such as if you access our products and services through a third party (e.g., through LinkedIn). Such third parties may provide information about you and your use of its service to us. We may also collect Personal Information about you from commercially or publicly available sources.

Use of Personal Information

We may use the Personal Information we collect for one or more of the following business purposes:

- to fulfill or meet the reason you provided the information, including responding to your inquiries, questions and/or other requests or providing our services and products;
- to support, develop and improve our Sites, products and services;
- to create, maintain, customize and secure your account with us;
- to process your requests, transactions and payments and prevent transactional fraud;
- to help maintain the safety, security and integrity of our Sites, products and services, databases and other technology assets;
- to respond to law enforcement requests and as required by applicable law, court order or other governmental regulations;

- marketing purposes;
- enforcing our [Terms of Use](#); and/or
- for such other purposes as may be described to you when collecting your Personal Information or as otherwise set forth in this Notice.

We will not collect additional types of Personal Information or use the Personal Information we collected for materially different, unrelated or incompatible purposes without providing you prior notice. See “[Changes to our Privacy Notice](#)” for further details.

Disclosing Personal Information

We may disclose your Personal Information to the following third parties:

- our subsidiaries and affiliates;
- our clients (i.e. lenders);
- service providers and/or other third parties who provide or perform certain services on our behalf, including, but not limited to, the maintenance and support of our online services and marketing research and analysis, or whom we otherwise engage in connection with our business, including those we engage to detect or prevent criminal activity, fraud, material misrepresentation or nondisclosure with respect to our title services;
- law enforcement or other governmental authorities if we become legally compelled to do so (i.e. by deposition, interrogatory, subpoena, court order or to comply with applicable law) or otherwise upon good faith belief that such disclosure is necessary for fraud prevention or otherwise to investigate or prevent a violation of law;
- lien holders, judgment creditors or other parties claiming an interest in title whose claim or interest must be determined, settled, paid or released prior to completing your transaction;
- underwriters in connection with the title services that we provide;
- a third-party purchaser or potential purchaser in connection with an Acquisition Transaction;
- potential third-party investors in SUMMIT or any of its affiliates; and
- other parties for whom you have given us written authorization to disclose your Personal Information.

We implement and maintain physical, electronic and procedural safeguards reasonably designed to: (i) protect the security, confidentiality and integrity of your Personal Information; (ii) prevent unauthorized use, access to, disclosure, loss or theft of your Personal Information; and (iii) prevent and detect unauthorized intrusions into our systems. We do not disclose, make available or provide

access to any of your Personal Information to any of our subsidiaries, affiliates, employees, contractors, service providers or third parties, other than those who require such Personal Information in order for us to provide our products and services and who are bound by confidentiality obligations or as otherwise provided for in this Notice. We carefully select and monitor any contractors, service providers, third parties, potential investors or potential third-party acquirers who have access to your Personal Information and we require them to keep it confidential. However, we are not able to guarantee the security of our Sites.

Your Rights and Choices

It is your choice to submit Personal Information to us, regardless of whether such information is provided to us directly or indirectly. If you choose to opt out of submitting Personal Information to us we may not be able to provide certain of our services or products.

As permitted by law, you may opt-out of disclosure or use of your Personal Information by notifying us by one of the methods at the end of this Notice.

Information from Children

Our Sites are meant for adults and is not intended or designed to attract children under the age of 16. We do not knowingly collect Personal Information from any person under the age of 16 without permission from a parent or guardian. If you are under the age of 16, do not provide us with any information about yourself, including your name, address, email address, telephone number, etc. If we learn we have collected or received Personal Information from anyone under the age of 16 without parental consent, we will promptly delete that information. If you believe we might have any Personal Information from or about anyone under the age of 16, please contact us at:

SUMMIT SETTLEMENT SERVICES, LLC
50 JORDAN STREET
EAST PROVIDENCE, RI 02914

Attention: Compliance Department
Email: compliance@summitsettlement.net