

Privacy Policy

Effective Date: January 1, 2023

Last Reviewed on Date: December 22, 2022

Introduction

Adfitech, and its subsidiaries and affiliates (“*Company*” or “*We*”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.adfitech.com (our “*Website*”) or otherwise interact with us, whether online or in person, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- Offline or through any other means.

This policy does not apply to information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website. Further, this policy does not apply to any Personal Data collected from or about any of our employees or our subsidiaries’ employee. Personal Data collected from any such employees will be protected by our employment policies and handbook.

To exercise your California or Virginia Privacy Rights, please click [here](#).

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website, purchase our goods or services, provide us with your Personal Data, or otherwise interact with us. By accessing or using this Website, providing us with Personal Data, purchasing our goods or services, or otherwise interacting with us, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this Website, our products or services, provision of your Personal Data, or other interactions with us after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect Personal Data from children under 16. If you are under 16, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Site or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Data from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at compliance@mortgageconnectlp.com.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website and products and services and those individuals that interact with us. We collect information: (i) by which you may be personally identified, such as name, birthdate, age, postal address, e-mail address, telephone number, veteran status, personal preferences, credit card information, including billing address, or any other identifiers by which you may be contacted online or offline; (ii) that is about you but individually does not identify you, such as IP address or other online identifiers; and/or (iii) about your internet connection, the equipment you use to access our Website and usage details (collectively, "Personal Data").

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- From third parties, for example, our business partners.

Information You Provide to Us

The information we collect or receive may include:

- Information that you provide by filling in forms on our Website. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions with you and of the fulfillment of your orders.
- Your search queries on the Website.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or our online services (behavioral tracking). Some web browsers may transmit “do not track” signals. Web browsers may incorporate or activate these features differently, making it unclear if users have consciously activated them. As a result, at this time we do not take steps to respond to such signals.

The information we collect automatically helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Web Beacons.** Pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

There are additional disclosures for California, Colorado, Virginia, Connecticut and Utah residents in the **Special U.S. Privacy Information** Section below.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Data:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- If applicable, to create, maintain, customize, and secure your account with us.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.

- To personalize your experience and to deliver content and product and service offerings relevant to your interests.
- To allow you to participate in interactive features on our services.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To help maintain the safety, security, and integrity of our services, products, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our products and services.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by the Company about our users is among the assets transferred.
- In any other way we may describe when you provide the information.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For any other purpose with your consent.

For more information, see Choices About How We Use and Disclose Your Information.

There are additional disclosures for California, Colorado, Virginia, Connecticut and Utah residents in the **Special U.S. Privacy Information** Section below.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by the Company about our Website users is among the assets transferred.

- To fulfill the purpose for which you provide it. For example, if you give us an email address for an additional recipient(s), we will transmit the contents of that email and your email address to the additional recipient(s).
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your Personal Data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply the terms of any agreements applicable to the use and processing of your Personal Data.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

There are additional disclosures for California, Colorado, Virginia, Connecticut and Utah residents in the **Special U.S. Privacy Information** Section below.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Cookies and Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- We do not control any third parties' collection or use of your information to serve interest-based advertising.

There are additional disclosures for California, Colorado, Virginia, Connecticut and Utah residents in the **Special U.S. Privacy Information** Section below.

Accessing and Correcting Your Information

You may send us an email to compliance@mortgageconnectlp.com to request access to, correct or delete any Personal Data that you have provided to us. We may not be able to delete your Personal Data in certain circumstances, including if such information was provided for the purpose of providing a service we have already provided that required the disclosure of the Personal Data to perform the service but we will comply to the extent required by applicable law. We also may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

There are additional disclosures for California, Colorado, Virginia, Connecticut and Utah residents in the **Special U.S. Privacy Information** Section below.

Special U.S. Privacy Information

If you are a California, Colorado, Virginia, Connecticut or Utah resident, state law may provide you with additional rights regarding our use of your Personal Data.

Some of the Personal Data we collect information constitutes “personal information” or “sensitive personal information” under the California Consumer Privacy Act of 2018 (“CCPA”) and the California Privacy Rights Act of 2020 (“CPRA”) or “personal data” or “sensitive data” under the Virginia Consumer Data Protection Act (“VCDPA”), the Colorado Privacy Act (“ColoPA”), the Connecticut Act Concerning Personal Data Privacy and Online Monitoring (“CTDPA”), Utah Consumer Privacy Act (“UCPA”), or other similar state laws. Any such “sensitive personal information” or “sensitive data” is referred to as “Sensitive Data” herein.

In particular, within the last twelve (12) months, we collected (whether directly, indirectly (e.g., by observing your actions on the Site) or from third parties) the categories of Personal Data, which constitute “personal information” or “sensitive personal information” under the CCPA and CPRA or “personal data” or “sensitive data” under the VCDPA, ColoPA, CTDPA, UCPA or other similar state laws, listed in the table below. Any such collection has been for the purposes included in the appropriate section of the **How We Use Your Information** Section above.

Personal Data Category	Examples	Retention Period (in absence of a deletion request or legal requirement)	Disclosed for a Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising
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.	7 years	Yes	No
California Customer Records personal information	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance	7 years	Yes	No/

Personal Data Category	Examples	Retention Period (in absence of a deletion request or legal requirement)	Disclosed for a Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising
	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.			
Protected classification characteristics under state or federal law	Age (40 years or older), citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.	7 years	Yes	No
Commercial information	Records of personal property to the extent necessary for Uniform Commercial Code security interest filings	7 years	Yes	No
Geolocation data	Physical location does not include precise geolocation, which is Sensitive Data.	7 years	Yes	No
Sensory data	Audio, electronic, visual, thermal,	7 years	Yes	No/

Personal Data Category	Examples	Retention Period (in absence of a deletion request or legal requirement)	Disclosed for a Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising
	olfactory, or similar information as necessary for accommodating the needs of the individual.			

Sensitive Data Category	Examples	Retention Period (in absence of a deletion request or legal requirement)	Disclosed for a Business Purpose	Sold or Shared for Cross-Context Behavioral Advertising
Government identifiers	Social security, driver's license, state identification card, or passport number	7 years	Yes	No.
Precise geolocation	N/A	7 years	Yes	No

For the purposes of this Section, Personal Data does not include publicly available information from government records, lawfully obtained, truthful information that is a matter of public concern, deidentified or aggregated consumer information or information specifically excluded from the scope of applicable data protection laws, such as the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), the Federal Farm Credit Act of 1971, and the Driver’s Privacy Protection Act of 1994.

We have not sold any Personal Data or Sensitive Data of consumers in the last 12 months, and we have not shared any Personal Data or Sensitive Data of consumers with third parties for cross-context behavioral advertising in the last 12 months.

We obtain the categories of Personal Data listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.

- Indirectly from you. For example, from observing your actions on our Website.
- From our affiliates and subsidiaries. From third party sources, including information from commercially available sources, such as public databases and data aggregators.
- From our financial services clients that request services from us. We may disclose your Personal Data or Sensitive Data to a third party for a business purpose. When we disclose Personal Data or Sensitive Data for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Data and Sensitive Data confidential and not use it for any purpose except performing the contract. We disclosed this Personal Data and Sensitive Data for a business purpose to the following categories of third parties:
 - consumer relations, including consumer complaint response services;
 - employee recruitment, career portal and job applicant services;
 - legal representation, including with regard to prevention harm to our company, its subsidiaries, our products or services or a person or property (e.g., fraud prevention);
 - vendors that perform back office services that assist us in providing the product or service;
 - trade vendor such as notaries, abstractors, appraisers, closing agents, or other real estate professionals necessary for carrying out the services.

As applicable, certain state privacy laws, such as the CCPA, CPRA, ColoPA, VCDPA, CTDPA, and UCPA provide their residents, respectively, with specific rights regarding their Personal Data.

A. Access to Specific Information and Data Portability Rights. You have the right to request that we disclose certain information to you about our collection and use of your Personal Data and Sensitive Data. Once we receive and verify your request (please see Subsection ***Exercising Access, Data Portability, Correction, and Deletion Rights*** below for more information), we will disclose to you, as applicable:

- The categories of Personal Data and Sensitive Data we collected about you.
- The categories of sources for the Personal Data and Sensitive Data we collected about you.
- Our business or commercial purpose for collecting that Personal Data and Sensitive Data.
- The categories of third parties with whom we disclose that Personal Data and Sensitive Data.
- The specific pieces of Personal Data and Sensitive Data we collected about you (also called a data portability request).

B. Correct Specific Information. You may have the right to request that we correct inaccurate Personal Data about you. Once we receive and verify your request (please see Subsection ***Exercising Access, Data Portability, Correction, and Deletion Rights*** below

for more information), we will use commercially reasonable efforts to correct the information to comply with your request. This right is not afforded to residents of Utah.

C. *Deletion Request Rights.* You have the right to request that we delete any of your Personal Data or Sensitive Data that we collected from you and retained, subject to certain exceptions. Once we receive and verify your request (please see Subsection ***Exercising Access, Data Portability, Correction, and Deletion Rights*** below for more information), we will delete (and direct our service providers to delete) your Personal Data or Sensitive Data from our records, unless an exception applies. In responding to your request, we will inform you whether or not we have complied with the request, and, if we have not complied, provide you with an explanation as to why.

A service provider shall not be required to comply with a deletion request submitted by the consumer directly to the service provider.

We may deny your deletion request if retaining the information is necessary for us, or our service provider(s), to:

- Complete the transaction for which we collected the Personal Data, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Help to ensure security and integrity to the extent the use of your Personal Data is reasonably necessary and proportionate for those purposes.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his/her free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.

D. *Right to Limit Use and Disclosure of Sensitive Data.* You may have the right, at any time, to direct us to limit our use and disclosure of your Sensitive Data to use which is necessary for certain purposes enumerated in applicable law (“Enumerated Purposes”).

To the extent we use or disclose your Sensitive Data for purposes other than the Enumerated Purposes (described below), you have the right to limit such use or disclosure. Currently, we do not use Sensitive Data for purposes other than the Enumerated Purposes. To the extent applicable, you may also have the right to withdraw consent you provided for our use and disclosure of your Sensitive Data.

The Enumerated Purposes include the following:

- (1) To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- (2) To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Data, including Sensitive Data.
- (3) To resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for those actions.
- (4) To ensure the physical safety of natural persons.
- (5) For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with us, provided that we will not disclose the Sensitive Personal Data, to another third party and will not use it to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with us.
- (6) To perform services on behalf of us, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of our business.
- (7) 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 by, manufactured for, or controlled by us.
- (8) For purposes that do not infer characteristics about you.

E. Exercising Access, Data Portability, Correction and Deletion Rights. To exercise the access, data portability, correction, and deletion rights described above, please submit a consumer request to us through one of the following:

- Calling us at 1-866-789-1814.
- Visiting www.simplysecuresign.com
- Compliance@mortgageconnectlp.com

- When you use a request method above, we will request certain information for verification purposes, such as your name, address, and e-mail address. We will use this information to verify this is a permitted request, such as by matching your name and address with information in our records. Depending on the type of request, we may require a certain number of data points to allow for verification.

Only you, or a person properly authorized to act on your behalf, may make a verifiable consumer request related to your Personal Data. You may also make a verifiable consumer request on behalf of your minor child.

An authorized agent may make a request on your behalf using the request methods designated above. Additionally, if you use an authorized agent to submit a consumer request, we may require the authorized agent to provide proof that you gave the agent signed permission to submit the request. We may also require you to verify your own identity directly with us or directly confirm with us that you provided the authorized agent permission to submit the request.

You may only make a consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data or an authorized agent of such person.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you.

Making a consumer request does not require you to create an account with us.

We will only use Personal Data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

If we deny your request, you may have the right to appeal our decision. Further, if you appeal and your appeal is denied, you may have the right to complain to your state's attorney general. You may appeal your decision by contacting us at compliance@mortgageconnectlp.com

F. Response Timing and Format. In accordance with applicable law, we endeavor to respond to consumer requests within forty-five (45) days of its receipt. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing.

The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your

Personal Data that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

G. *Non-Discrimination.* We will not discriminate against you for exercising any of your rights. Unless permitted by applicable laws, in connection with you exercising your rights, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by applicable laws that can result in different prices, rates, or quality levels. Any legally-permitted financial incentive we offer will reasonably relate to your Personal Data's value to us and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

H. *Other California Privacy Rights.* California Civil Code Section § 1798.83 permits California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. To make these requests, please send an email to compliance@mortgageconnectlp.com or by mail to 600 Clubhouse Drive, Moon Township, PA 15108 ATTN: Compliance-CA Privacy Request

Data Security

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Website. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an

up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Phone:1-866-789-1814

Email: compliance@mortgageconnectlp.com

Postal Address:

Adfitech

Attn: Compliance- Privacy Request

600 Clubhouse Drive

Moon Township, PA 15108