

## **NOTARIZE PRIVACY POLICY**

This policy applies to any visitor to our website or user of our applications or services, including (i) casual visitors who do not sign up for an account, and (ii) visitors who have registered for an account or (iii) users who have been sent to us in order to complete a document or witness a signature.

### **Our Data Protection Officer**

Our Data Protection Officer is Gary Weingarden. Mr. Weingarden has over a decade of experience in consumer privacy and information security and is passionate about earning your trust.

### **Our Relationship with You**

Depending on which kind of visitor you are, we may be working with you directly or by providing a service to another company. We will explain how this impacts your rights and our practices where it is relevant.

### **Our Information Collection Practices**

#### **Information we collect directly from you and about you**

We collect information about you directly from you, from the other parties involved in transactions (like a mortgage lender or title company), from third-parties that provide services that we need in order to provide our services (like credential analysis companies that review your photo ID), and from your use of the site.

Most content is accessible without an account, but to use our services you will usually need to sign up for one. Over the last 12 months we have collected the following categories of information:

- Identifiers like your name, address, social security number, username, email address, social security number, driver's license number, passport number, credit card number and other information that's unique to you.
- Things about you that are considered "protected classifications" under state or federal law, like your sex, age, surname, and appearance.
- "Commercial" information, like records of property that you own, and products or services that you have bought.
- Our services usually include audio and video recording, which record "biometric" information like your face, voice, and mannerisms.
- Your interactions with our app or website.
- The location you are at when you use our service.

We get most of this information directly from you, but some of the information is collected by our service as part of how it works or passively as part of the process. We collect this information to provide our services to you, to complete the transactions in which you are participating, to detect fraud, to prevent crime, and for marketing and analytics.

We share some of the information that we collect with the businesses and other parties that are involved in the transactions for which you use our service.

In most cases we collect the following details from you:

- Name
- Address
- Email address
- Phone number
- Last four digits of your Social Security number if applicable (for identity verification purposes)
- Images (front and back) of government-issued identification
- Depending upon the transaction, a secondary form of identification document
- Documents that you need to sign (and sometimes additional documents that do not require a signature)
- Names and email addresses (and sometimes additional information) of other parties to the transaction or witnesses
- If you register, a username and password.
- Sessions often involve an interactive audio and video conversation with a notary, which is recorded

We collect some additional information based on your interactions with our services. This information includes things like:

- IP address
- Device Identifier
- Type and version of web browser
- Other typical log information

### **Information you provide to third-parties**

We use a third-party payment processor to accept payments. If you are paying for our services directly, you may be required to provide payment details to this third-party. Your interactions with our payment processor are subject to any the processor's terms and privacy policy. We do not collect or store your payment information.

### **How We Handle Your Information**

We use your personal information to:

- Provide the services that you or another party have requested.
- Maintain the availability and security of our Platform
- Improve the delivery and performance of our Services
- Customize the content and experience, including pre-filling forms and anticipating the details of your transaction
- Introduce you to products and services that we offer, and update you on news about our company
- Comply with contractual, statutory and all other legal obligations
- Respond to legal processes and requests, like subpoenas and warrants
- Investigate or prevent frauds and crimes and violations of our contracts and policies
- Market our service and perform analytics
- Automate decision-making to improve the efficiency of our services

## How we share and store your information

We share your information as follows:

- **You and other designated recipients.** Documents, audio/video recordings and other related information will be stored and shared with you and any party with the required consent to access the information. For example, in a real estate transaction, this could include your lender or title agent. You or another party to a transaction may designate others who are permitted to access your information. If you were sent to us by someone else (like a mortgage lender) we may store copies of your documents and audio/video recordings under a contract with them. This may limit our ability to delete documents or audio/video recordings. If you request deletion in these cases, we will do our best to accommodate your request and tell you what we can't delete and why.
- **The notary.** In most cases, the notary's "journal" (which includes some basic details about the transaction and the audio/video recording) belongs to the notary. We store this information as a service to the notary. The notary has access to this information in our system.
- **Verification portal.** Our service also includes a verification portal. Using an ID and PIN issued to you after signing, you may give others access to your completed documents by sharing these details with them.
- **In some cases, based on public request.** The notary is often required to produce the journal information (which includes the audio/visual recording) to certain interested parties, and sometimes to any member of the public who requests it. We direct requests like this to the notary, who will decide whether sharing is required.
- **Support Community Users.** If you upload feedback to any public blog, message board system, or review capability that we provide, your user name and any information that you post, including, without limitation, reviews, comments, and text may be available to, and searchable by our users. Messages you send in our support channel will be viewable only by you and us.

- **Service Providers.** We disclose the information we collect from you to service providers, contractors or agents to provide the services that you request, and to improve our services and marketing efforts.
- **Affiliates.** We may disclose the information we collect from you to our affiliates or subsidiaries, including Notarize, LLC in order to provide our services.
- **Mergers, acquisitions, and sales of business.** In cases of a proposed or actual merger or acquisition, or a sale of part of our business, or if we are involved in a bankruptcy, we may transfer the information we have collected from you.
- **Legal process or investigation.** We might also disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order, subpoena, or regulatory inquiry.
- **Claims, defenses, and prevention of fraud and crime.** We will disclose the information we collect from you where we believe it is necessary to support a claim or defense in litigation, to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our agreements and policies.

**Sale of Personal Information.** We are not a data broker and do not sell personal information for monetary consideration, but we do share minimal personal information with marketing partners for online advertising purposes, which is considered a “sale” under applicable privacy law. We do not have actual knowledge of collecting or sharing data for consumers under 16. Here are the categories of personal information we “sell”:

- Internal Identifiers that help us identify customers
- IP address
- Device Identifier
- Type and version of web browser
- Other typical log information

Here are types of third parties that receive each of these categories of personal information:

- Third party companies that provide online advertising services

## **Cookies and monitoring**

We use cookies and other tracking mechanisms to track information about your use of our Platform or Services.

Cookies are information that is stored on your computer for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Platform and Services, while others are used to enable a faster log-in process or to allow us to understand how you use our website and services. There are two types of cookies:

- **Session cookies.** Session cookies only live as long as you are logged into your account. We use session cookies to allow you to remain logged in. This allows us to process your online transactions and requests and without constantly reverifying your identity.
- **Persistent cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to understand how frequently you visit our website, and for related statistical purposes.

**Disabling cookies.** Most web browsers automatically accept cookies by default, but if you prefer, you can edit your browser options to block them in the future. If you have cookies disabled on your browser, some features of our website and services may not work correctly.

**Do Not Track.** Currently, our systems do not recognize browser “do-not-track” requests. You can, however, disable certain tracking as discussed in this section.

### **Other tracking and monitoring**

**Pixels.** We may use “pixel tags”, small graphic images (also known as “web beacons” or “single-pixel GIFS”), to tell us what parts of our website have been visited or to measure the effectiveness of our search tools. We use a similar technique to measure the effectiveness of our web and search engine advertising.

**Quality assurance.** In order to improve our services and make sure that our customers and users have the best possible experiences, we monitor:

- **Communications.** We monitor all calls, chats, emails, and other communications you have with our customer support staff. In particular all voice calls are recorded and some may be monitored live.
- **Interactions with our website.** We are able to “replay” most of your interactions with our website. This feature does not record or store sensitive user information, but we are able review interactions. It simply allows us to see how we can improve usability. We also use a third party called Hotjar, a behavior analytics software designed to give us an aggregated view of user behavior on our sites. This provides us with insights to improve the overall experience for our users. It is not designed to track individual users and does not collect sensitive personal information. You can opt out by changing your “do-not-track” settings; for more information on how to opt out visit <https://www.hotjar.com/policies/do-not-track/>.
- **Monitoring of video sessions.** We may monitor your video session with a notary in order to maintain quality of service and usability. The session is also recorded and we may review the recording for similar purposes.

**Advertising.** We collect and use website activity information for online advertising purposes. We use third-party vendors, such as Google, to show you advertisements

across websites. These third parties use cookies and device identifiers to select advertisements for you based on past website activity or mobile application use. You can opt out of this use of cookies and device identifiers by visiting Google's Ads Settings, or by using the Network Advertising Initiative opt-out page.

## **Requests You Can Make About Your Information**

**Right to know.** You have the right to request us to tell you what information we gather, use, share, or sell about you, or in some cases your household. You can request these details by emailing [privacy@notarize.com](mailto:privacy@notarize.com) or by using this form <https://www.notarize.com/privacyrequest> We will ask you to verify your request by logging into your account and electronically signing a document.

**Right to Delete.** You have a right to ask us to delete your information. In some cases, we may not be able to do so because of contractual or legal requirements. You can ask us to delete your information by emailing [privacy@notarize.com](mailto:privacy@notarize.com) or using this form: <https://www.notarize.com/privacyrequest> We will ask you to verify your request by logging into your account and electronically signing a document.

**Right to Opt Out of the Sale of Personal Information.** We are not a data broker and do not sell personal information for monetary consideration, but we do share minimal personal information with marketing partners for online advertising purposes, which is considered a "sale" under applicable privacy law.

You may opt out of the sale of personal information by clicking the opt out link in our [privacy policy](#).

You may also opt out by submitting a privacy request and checking the "opt out of the sale of personal information" option.

**Right to Non-discrimination.** We will not discriminate against you for making any of the requests that we have described. Doing so would violate your rights.

**Authorized agents.** If you want someone else to make a request for you, you have two choices:

1. You can complete a power of attorney form. Here is an example of a power of attorney form:  
[http://file.lacounty.gov/SDSInter/dca/1021444\\_4.18.17\\_UniformStatutoryFormPowerofAttorney.pdf](http://file.lacounty.gov/SDSInter/dca/1021444_4.18.17_UniformStatutoryFormPowerofAttorney.pdf)
2. You can give them written permission to submit a request for you. If you do that, we will require you to verify your identity by logging into your account and confirming that you have authorized that person to make a request for you or if this is not feasible, we will work with you to find the best way to confirm that you authorized the this agent to contact us on your behalf.

## **Response Timing and Format**

We will acknowledge your request within 10 calendar days. We do our best to verify your identity and respond to your request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Our response will explain any reasons we cannot fully comply with a request. We do not charge a fee to process or respond to your requests.

In some cases, we may be working for a different company. For example, if you are using our service to complete a mortgage, your lender or title company probably hired us to notarize some documents. In those cases, we may also be retaining data for the company that hired us, and we may not be able to completely honor your request as a result. If that occurs, we will tell you and include contact information at the other company.

## **Security Of Your Personal Information**

**Our goal is to earn your trust.** Our security systems are designed to protect your information from falling into the wrong hands, from being altered or corrupted, or from becoming unavailable. Our security systems are built to prevent and be resilient to intrusions, malware, and ransomware. We take pride in the trust you place in us, and we do our best to honor that trust. We do this by continuously improving our security measures, training our employees, and focusing on trust as our core offering.

**We also need your help.** The weakest part of any security system is people—including you. You can help secure your data by creating a strong password and storing it securely, logging out of your account after you are done, having a secure password on your phone, avoiding insecure WiFi and just using common sense. If someone calls you and asks for your password, do not share it. We will never do that.

## **Marketing**

We will send occasional promotional or informational emails to you relating to services and benefits we offer. You can opt-out of such communications, at any time, by following the opt-out instructions contained in the e-mail or by sending such a request to [support@notarize.com](mailto:support@notarize.com). If you opt-out of receiving emails about recommendations or other information we think may interest you, we will still send you service messages about your account or any services you have requested or received from us or other notices as required by law.

## **Site for US only and adults only**

Our services are meant for transactions that are based in the United States. Users need a Social Security Number in order to complete a notarization. Our services are not

targeted or offered to citizens or permanent residents of countries other than the United States. Similarly, we do not offer our services to minors. Our website is designed for adults and we do not knowingly collect data from children or minors.

### **Material Changes to this Policy**

We will provide email notification to you whenever we make material changes to this policy to ensure you know when the changes will become effective.

### **Contact us With Questions or Concerns**

If you have questions or concerns about our privacy policies and practices, or if you need to update your personal information, you can email us at [privacy@notarize.com](mailto:privacy@notarize.com) or log into your account and chat with us.