



Notarize Privacy Policy

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Here is What You Most Need to Know: We use your personal information to provide you with our Platform and Services, to communicate with you, and to comply with our business and legal obligations, as set out below in this Privacy Policy. Our one and only goal is to provide you with the Services you want and to exceed all your expectations. We want you to be happy with your experience, to come back and use Notarize again, and to refer us to your family, friends and networks.

So let's say this right up front: **WE DO NOT SELL, RENT, OR DISCLOSE YOUR PERSONAL INFORMATION TO THIRD PARTIES SUCH AS DATA BROKERS OR ADVERTISERS.**

Here are all the specifics:

We maintain a website at <https://notarize.com> (the "**Platform**"), mobile software applications, and related APIs (collectively, the "**Platform**"), through which users can obtain electronic notarization, e-signature, identity verification and other services (the "**Services**"). In this Privacy Policy ("**Policy**"), we describe how we collect, use, and disclose information that we obtain about visitors to the Platform or that is collected through the Platform. We also describe how we share your information with other entities, including with Affiliates, who are required to comply with this Privacy Policy. Our Privacy Policy applies to any visitor to the Platform, including (i) casual visitors who do not sign up for an account ("**Visitors**"), and (ii) users who have registered through the Platform to receive the Services ("**Subscribers**") or who have been designated by **Subscribers** to sign documents or otherwise participate in Services on the Platform ("**Signatories**," "**Witnesses/Participants**" and "**Other Users**"). Subscribers, Signatories, Witnesses/Participants and Other Users are collectively referred to as "**Registered Users**." All of the foregoing, plus Visitors, are referred to as "**You**."

By visiting or registering on the Platform, or using any of our Services, you acknowledge that your personal information will be handled as described in this Policy. Your use of our Platform or Services, and any dispute over privacy, is subject to this Policy and our [Terms of Use](#). All defined terms used in this Privacy Policy and which are also used in our [Terms of Use](#) have the meanings set forth in the Definitions in our [Terms of Use](#).

If you are a California Resident, this Privacy Policy includes and serves as your "Notice at time of Collection" under the California Consumer Privacy Act ("**CCPA**") regarding the categories and elements of personal information we receive and collect about you, the sources of such information, and the disclosures and uses we make of such information.

Under the CCPA, "personal information" is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. It does not include publicly available data as defined by the CCPA, deidentified or aggregated consumer information, or information excluded from the CCPA's scope due as set forth in the CCPA (such as certain health or medical information covered by other statutes such as the federal HIPAA or personal information covered by the Gramm-Leach Bliley Act).

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1. THE INFORMATION WE COLLECT ABOUT YOU.

We collect information about you directly from you, from the other parties related to your Transaction who provide us information about you, and automatically through your use of our Platform or Services.

1.1. *Information We Collect Directly From You and About You From Other Parties Related To Your Transaction.* Most content on the Platform is accessible without an account. However, in order to use the Services on the Platform, you must create an account and become a Registered User. Different Services require that you provide somewhat different forms or types of information. In general, you must provide to us the following minimum mandatory information in order for us to provide you with the Platform and your requested Services. If a business or other User is creating or facilitating a Transaction for you, certain of this information may be provided to us by them on your behalf:

- your name;
- your address;
- your e-mail address
- your phone number;
- the last four digits of your Social Security number (for identity verification purposes);
- a government-issued form of identification;
- depending upon the Transaction, a secondary form of identification document;
- documents relating to the Services requested;
- name and email information, if any, for designated recipients;
- if applicable based on the nature of the Transaction and applicable law, name, phone number, address, email address, last four digits of social security number, government identity credentials, and other information provided for any other signatories, witnesses or other participants in your Transaction; and
- other Transaction information required for us to provide to you and complete the Services.

The registration process provides Registered Users with a username and password to enable access to the Services on the password-protected portions of the Platform.

Some of the Services we provide on the Platform will include a live audio-video link between you, a Notary and any witnesses or other participants in the audio-video session (such as, for example, title agents or other permitted parties with a role in a real estate transaction), so that the Notary

can interact with you and them and, as applicable, make determinations about your identity and witness the signing of relevant document(s) (the "Session Video"). This means that we will capture audio and video of Registered Users and others who make use of or participate in the Services and whatever content is displayed during the Session Video. By requesting and participating in the Services, you confirm that all persons depicted in the Session Video are authorized and permitted to participate and have consented to do so.

1.2. Information We Collect Automatically. We automatically collect the following information about Visitors or Registered Users through cookies and other web tracking technologies: your IP address (the Internet address of your computer or device), your computer's or device's name or identifying info, the type and version of your web browser, referrer addresses and other generally-accepted log information. We may also record page views (hit counts) and other general statistical and tracking information, which will be aggregated with that of other users in order to understand how our Platform is being used, and for security and monitoring purposes. We may combine this information with other information that we have collected about you, including, where applicable, your name, location and other personal information such as your browsing patterns. Please see the section "Cookies and Other Tracking Mechanisms" below for more information.

1.3. Log Information. We additionally automatically collect information related to Registered Users' actions on the Platform to create session records and Document, Transaction and account level audit trails. This information generally encompasses all Registered User session activity on the Platform, including but not limited to the following type of information: when and how a Registered User accessed the Platform, registered for an account, was authenticated, created and adopted an e-signature, when and how a Document was uploaded to the Platform, when a Document is opened or viewed, any changes or modifications made to a Document by you or anyone else associated with the transaction, and movement of annotations.

1.4. Information We Collect From Public Sources and Service Providers. For Registered Users, as applicable in the specific context of use of the Platform and delivery of Services, in order to verify identification information as part of our legal and contractual obligations, we will collect and review personal information and identity credentials provided by you through use of identity database services and tools provided by third party service providers.

1.5. Information Collected by Third Parties. Our Platform and Services contain a link to a third-party payment provider to enable you to make payment for any Services (in the event your payment obligations to us are not managed through invoicing and other methods of payment). This company acts as separate entity and Controller (as that term is defined by applicable law) in relation to any billing or credit card information, and its processing is not governed by this Policy. We do not hold your billing data, other than records of actual charges and related information, and we are not responsible for the information practices of such third party.

2. HOW WE USE YOUR INFORMATION.

We use your personal information for the following purposes, subject to any limitations in applicable law or our contracts with Registered Users and third parties:

- 2.1.** To fulfill or meet the reason you provided the information, including by providing our Services to you. To maintain your account and your access to our Platform and Services, to communicate with you about your use of our Services, to respond to your inquiries, to process payment, and for other customer service purposes. We offer a range of Services, including e-signing and notarization of documents. We use your information to confirm your identity, as applicable, to receive and process your uploaded Documents in order to complete your Transaction and perform all requested post-Transaction processes, to communicate with you via email, phone mail regarding your Transaction, to maintain records of your Transaction for legal purposes and for your use, verification, and transmittal to receiving parties.
- 2.2.** To record and preserve information collected and generated in the course of providing the Services including information provided by you and others relating to you, as set forth above, as well as

session and audit trail information and the Session Video.

- 2.3. To maintain the availability and security of our Platform, to improve the delivery and performance of our Services, to tailor the content and information that we send or display to you, to offer personalized help and instructions to you, and to otherwise personalize your experiences while using the Platform or our Services.
- 2.4. To help improve our Site and Services which may include aggregating the personal information we collect or remove identifying personal information ("de-identifying") to limit or prevent identification of any specific user or device. To provide the Services and to address issues and resolve problems, we may also use data that has not been aggregated or de-identified. As one example, we may review transactions, including recorded video of those transactions, to help us check for errors or to address an identified issue with a Transaction.
- 2.5. For our own marketing and promotional purposes for our own products and Services. For example, we may use your email address to send you newsletters about events or special offers and promotions, or to otherwise contact you about our products or Services we offer which we think will interest you. You have the right to opt-out of these emails at any time as outlined below in Section 9 (Direct Marketing By Us).
- 2.6. To better understand how users access and use our Platform and Services, in order to improve our Platform and Services and respond to user desires and preferences, and for other data analytical purposes. In particular, we allow you to voluntarily participate in surveys, reviews and questionnaires which we will use for the purposes of monitoring and improving the use and appeal of the Platform and the Services.
- 2.7. To monitor responses on any blog, message board system, or review capability available on our Platform.
- 2.8. To comply with contractual, statutory and all other legal obligations, including without limitation the requirements of notarial law including identity verification and recordkeeping, e-signature law, and other laws applicable to transactions on our Platform; to respond to legal or regulatory requests in accordance with law; to enforce and protect our legal rights; as part of our general business operations; and for other business administration purposes.
- 2.9. Where we believe necessary to investigate, prevent or take action regarding illegal activities or situations involving potential threats to the safety of any person or violations of our [Terms of Use](#) or this Policy.

3. **HOW WE SHARE YOUR INFORMATION.**

We share your information as follows:

3.1. ***Designated Recipients, Transaction Participants And Others With Required Permissions.***

Documents, the Session Video and other information resulting from the Transaction and our Services will be shared with you and any party with the required authority and/or permissions to see such information after the Transaction is completed. This could include a recipient set up at the time a Subscriber created a Transaction, or the Registered User, or other parties to the Transaction with necessary authority and/or permissions. For example, in a real estate transaction, this could include your lender or title agent. It could also include a receiving party that you or another party to your Transaction, who has such authority, gives permission in order to review the information or to verify the Transaction, such as by using our Verification Portal.

3.2. ***To Those With A Legal Right To See Such Information.*** We will share your information with regulatory agencies, enforcement authorities, parties with a legal subpoena, or members of the public or other parties with the legal right to compel us to provide such information for their review. (Note that notarial journals and session videos are available for public review under specified conditions and circumstances in certain states.) All such sharing by us will be in accordance with the requirements of applicable law.

3.3. ***Support Community Users.*** If you upload feedback to any public blog, message board system, or review capability available on our Platform, your username and any information that you post, including, without limitation, reviews, comments, and text will be available to, and searchable by, all users of the Platform. Messages you send in our Support channel, to us, will be viewable only by you and us.

3.4. ***Service Providers.*** We disclose the information we collect from you to service providers, contractors or agents who facilitate your Transactions by providing services to us. For example, we engage third

parties to provide database identity verification support services, and a third- party vendor to provide the live video link necessary to create the Session Video (the "Video Vendor"). Once we receive the Session Video, the Video Vendor is required to delete its copy of the Session Video.

- 3.5. Platform Vendors.** Some of our service providers perform functions relating to the Platform. For example, we may employ other companies to perform IT functions on our behalf, such as hosting or maintaining the Platform (collectively, "Platform Vendors").
- 3.6. Affiliates.** We may disclose the information we collect from you to our affiliates or subsidiaries, including Notarize, LLC. However, if we do so, it will be to provide you with our Platform and Services, and accordingly any such entity's use and disclosure of your personal information will be fully subject to all existing obligations and limitations governing and affecting such data, including under applicable law, all applicable contracts, and as set forth in this Policy and in our [Terms of Use](#).
- 3.7. Business Transfers.** If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or if we are involved in any bankruptcy proceedings, we will transfer the information we have collected from you to the other company. If we do so, its use and disclosure of your personal information will be subject to all existing obligations and limitations governing and affecting such data, including under applicable law, all applicable contracts, and as set forth in this Policy and in our [Terms of Use](#).
- 3.8. In Response to Legal Process.** 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 or a subpoena.
- 3.9. To Protect Us and Others.** We will disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our [Terms of Use](#) or this Policy, or as evidence in litigation in which Company is involved.

4. CALIFORNIA-REQUIRED PRIVACY DISCLOSURES.

The above information is applicable to all Users of our Platform and Services regardless of where the User is from and explains what information we collect and how we use and share it.

In addition, in accordance with California law, we provide the following additional information and disclosures in the following format. These disclosures should be treated as additional descriptions of our privacy practices as already set forth in Sections 1, 2 and 3 above, and are intended to be consistent with, and read in concert with, such prior sections of this Privacy Policy.

In reading this Disclosure, please note that, as set forth in this Privacy Policy, Notarize collects specific items of personal information directly from you, and from others involved in creating or facilitating your Transactions, in order to confirm your identity, to establish and maintain your account, to communicate with you, to provide you with the Platform and Services and to complete your Transactions as directed by you and the other parties to your Transactions, and to comply with our business and legal obligations. In addition, other personal information about you may be included within the documents uploaded as part of your Transactions. We therefore collect and process the Documents (and any personal information within them) as part of performing and completing your requested Transaction and Services and maintaining records, as set forth in the Privacy Policy. But as set forth throughout this Privacy Policy, we do not sell your personal information to third parties.

Categories of Personal Information	Do we collect?	Do we use or disclose for identified business purpose(s) as set forth in this Privacy Policy?	Do we sell your data to third parties?
Name, Contact Information and other Identifiers: Identifiers such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	YES	YES	NO
Customer Records: Paper and electronic customer records, such as your identity credentials or the documents in your Transactions, which may contain personal information such as name, signature, physical characteristics or description, address, telephone number, education, current employment, employment history, social security number, passport number, driver's license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial or payment information, medical information, or health insurance information.	YES	YES	NO
Protected Classifications: To the extent included in your identity credentials and related information, or in the documents uploaded in your Transaction, characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.	YES	YES	NO
Commercial Information: Commercial information including records of services purchased, obtained, or considered, or other purchasing or use histories.	YES	YES	NO
Biometric Information: Solely in connection with the audio-video recording and any images or descriptive information on government issued identity credentials, or as otherwise may be required by law for identification record or confirmation, or as included in the documents uploaded to the Platform for your Transactions, biometric, physiological or biological information that can be used alone or in combination with each other to establish individual identity, including video recordings or imagery of the face, fingerprint and voice recordings.	YES	YES	NO
Usage Data: Internet or other electronic network activity information, including, but not limited to, browsing history on our Platform and information regarding a person's interaction with our Platform, including access and session logs relating to your use of our Platform.	YES	YES	NO
Geolocation Data: Subject to the User's designated device preferences and applicable law, geographic location information about a particular individual or device.	YES	YES	NO

Audio, Video and other Electronic Data: Audio, electronic, photo, visual and audio information and recordings.	YES	YES	NO
Professional or employment-related information: Solely to the extent any such information may be included in information uploaded in the documents relating to your Transaction, employment history, qualifications, licensing, disciplinary record.	YES	YES	NO
Education Information: Solely to the extent any such information may be included in information uploaded in the documents relating to your Transaction, information about education history or background that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	YES	YES	NO
Profiles and Inferences: Inferences drawn from any of the information identified above to create a profile reflecting a resident's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	NO	NO	NO

5. **CALIFORNIA RESIDENT RIGHTS.**

California law grants California residents certain rights and imposes restrictions on particular business practices as set forth below. We embrace the policy underlying the CCPA and that's why we are accepting requests about personal information from all our US customers, whether from California or any other US state.

5.1. *Right to Opt-out of Sale of Personal Information.* California residents have the right to opt-out of our sale of their personal information. Please see the above: As set forth in this Privacy Policy, we use your personal information to provide you with our Platform and Services, to communicate with you, and to and to comply with our business and legal obligations. We do not sell your personal information to third parties such as data brokers or advertisers. However, we want to make sure you have the ability to tell us, just to be sure, not to sell your personal information. You can provide us such a Do Not Sell request at <http://www.notarize.com/privacyrequest>, or by emailing us at privacy@notarize.com.

5.2. *Notice at Collection.* At or before the point of collection, notice must be provided to California residents of the categories of personal information collected and the purposes for which such information is used. This Privacy Policy serves as such notice.

5.3. *Verifiable Requests to Delete and Requests to Know.* Subject to certain exceptions, California residents have the right to make the following requests, at no charge. If you make one of the following requests and we cannot delete or provide to you information about some or all of your personal information because an exception applies, we will explain the exception to you in our response:

- **Request to Delete:** California residents have the right to request deletion of their personal information that we have collected about them and to have such personal information deleted, except where an exception applies. 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 information, 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.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.
 - Exercise free speech, ensure the right of another consumer to exercise their 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.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- **Request to Know:** California residents have the right to request and, subject to certain exceptions, to receive a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the:
 - categories of personal information collected;
 - categories of sources of personal information;
 - business and/or commercial purposes for collecting and selling their personal information;
 - categories of third parties/with whom we have disclosed or shared their personal information;
 - categories of personal information that we have disclosed or shared with a third party for a business purpose;
 - categories of personal information collected; and
 - if applicable, categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party.

California residents may make Requests to Know up to twice every 12 months.

5.4. Submitting Requests. Do Not Sell Requests, Requests to Know, and Requests to Delete may be submitted at <http://www.notarize.com/privacyrequest>, or by emailing us at privacy@notarize.com. Please know that we are required to verify the identity of a person who makes any request relating to specific personal information.

We will respond to verifiable requests received from California consumers as required by law. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable 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 information or an authorized representative.
- 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 information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, depending upon the nature of your request and the sensitivity of the information you request, we may require you to log into your account as a way of validating who you are and your right to make the request.

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

For instructions on exercising sale opt-out rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

- 5.5. Response Timing and Format.** We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any Right to Know disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. 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 information that is readily useable.

We do not charge a fee to process or respond to your verifiable consumer request.

- 5.6. Right to Non-Discrimination.** The CCPA prohibits discrimination against California residents for exercising their rights under the CCPA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices, rates, or penalties on residents who exercise their CCPA rights, unless doing so is reasonably related to the value provided to the business by the residents' data.

- 5.7. Financial Incentives.** A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, provided the incentive is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentive offers and their material terms, the right to opt-out of such incentives at any time and may not be included in such incentives without their prior informed opt-in consent.

- 5.8. Additional California Rights.** In addition to the above notices and disclosures under California's CCPA, previous law provided California residents the right to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclose to third parties for their own direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to privacy@notarize.com.

6. OUR USE OF COOKIES.

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

- 6.1. Cookies.** Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser 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 track your activities at our Platform and Service. There are two types of cookies: session and persistent cookies.

- **Session Cookies.** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the Platform. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Platform.

- **Persistent Cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity.

We may use cookies to track your use of the Platform and to recognize you when you return to our Platform. In addition, we use "pixel tags", small graphic images (also known as "web beacons" or "single-pixel GIFS"), to tell us what parts of our Platform have been visited or to measure the effectiveness of searches customers perform on our Platform. Pixel tags also enable us to send email messages in a format customers can read, and they inform us whether emails have been opened, to help ensure that our messages are of interest to our customers.

6.2. *Disabling Cookies.* Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Platform who disable cookies will be able to browse certain areas of the Platform, but some features may not function.

6.3. *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 (e.g., by disabling cookies).

7. SECURITY OF YOUR PERSONAL INFORMATION.

We have put in place security systems designed to prevent unauthorized access to or disclosure of the personal information you provide to us, and we take all reasonable steps to secure and safeguard this personal information. Our Platform's password-protected section requires users to give us unique identifiers such as their username and password. Notarize employees are required to acknowledge that they understand and will abide by our policies with respect to confidential and private information. Additionally, we evaluate our third-party service providers based upon the type of information they receive and process for our customers and then, based upon our security guidelines, require key vendors to confirm with us their confidentiality obligations and use of security processes. Moreover, permissioned access to our databases containing personal information is governed by our internal security policy.

Our security systems are structured to deter hackers and others from accessing information you provide to us. However, due to the nature of Internet communications and evolving technologies, we cannot provide assurance that the information you provide us will remain free from loss, misuse, or alteration by third parties who, despite our efforts, obtain unauthorized access. Accordingly, you should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords, or for any activity on your account via unauthorized password activity, or for any improper uses of your account or password which you permit others to make.

7.1. *User Generated Content:* If you post content to any publicly-accessible spaces on our Platform, such as comments sections or public blogs, if any, all of the information that you post will be available to all visitors to our Platform. We cannot prevent such information from being used in a manner that violates this Policy, the law, or your personal privacy.

8. MODIFY MY PERSONAL INFORMATION.

Registered Users are able to modify personal information submitted by logging into your account and updating your profile information. You can also email us at support@notarize.com if you would like assistance changing your personal information.

9. DIRECT MARKETING BY US.

We will send periodic promotional or informational emails to you relating to our Platform and the 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. 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.

10. CHILDREN UNDER 16.

Our Services are not designed for minors under 18 years of age, and therefore not for children under 16 years of age. If we discover that a child under 16 has provided us with personal information, we will delete such information from our systems.

11. ADDITIONAL INFORMATION FOR EU INDIVIDUALS.

Certain rights may be held by those who access the Platform or our Services and who are residents of the European Union ("EU"). The following information is provided for the benefit of such users and in the event it may affect their rights:

- The Data Controller of the information collected through the Services is Notarize, Inc. which is headquartered in the United States at 745 Boylston Street, Unit 600, Boston, MA 02116. To exercise any rights that you have with regard to your personal information, you can contact us using the following details: privacy@notarize.com.

11.2. *The legal bases for using your personal information.* We collect your information as a Data Controller when we have a legal basis to do so. The following legal bases pertain to our collection of data:

- Our use of your personal information is necessary to provide you with access to our Platform and Services, to communicate with you, and otherwise to perform a contract or take steps to enter into a contract with you. This applies to our processing activities described in Section 2 above, including sections A and B.
- Our use of your personal information is in our legitimate interest as a commercial organization to provide access to or to make improvements to our Platform and Services, to communicate with you, to expand our business and increase revenue and business opportunities, and to ensure that we maintain a reputable status. This applies to our processing activities described at Section 2 above, including sections C,D,E, F and G.
- Our use of your personal information is necessary to comply with a relevant business, contractual, legal or regulatory obligation that we have. This includes performing compliant Transactions and providing compliant Services; forming and maintaining required records; providing legally required and permissions-based access to information; providing required notices; maintaining secure systems; tracking and managing use of data; and disclosing information where required to a court, authority, agency or regulatory body or member of the public with a right of access. This applies to our processing activities described at Section 2, including sections A,B,C,D, F, G and H.
- Our use of your personal information is in accordance with your consent. This applies to our processing activities described at Section 2, including sections A,B and D.

If you would like to find out more about the legal bases on which we process personal information, please contact us.

11.3. *Legal Rights Which May Apply to Users from the EU.* Subject to certain exemptions; subject to applicable US federal and state law (including without limitation notarial law and e-signature law) and the obligations imposed upon us thereunder regarding use of data, recordkeeping, notifications and other compliance requirements; and dependent upon the processing activity we are undertaking; European Union individuals may have certain rights in relation to personal information. These may include:

- **Right to access, correct, and delete your personal information:** If applicable, you have the right to request access to the personal information that we hold about you and: (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to

whom your personal information is transferred. You also have the right to request that we correct any inaccuracies or (subject to other controlling law) delete your information. We are not required to comply with your request to erase personal information if the processing of your personal information is necessary for compliance with a legal obligation or for the establishment, exercise, or defense of legal claims.

- **Right to restrict the processing of your personal information:** If applicable, you have the right to restrict the use of your personal information when (i) you contest the accuracy of the data; (ii) the use is unlawful but you do not want us to erase the data; (iii) we no longer need the personal information for the relevant purposes, but we require it for the establishment, exercise, or defense of legal claims; or (iv) you have objected to our personal information use which we have justified based on our legitimate interests verification as to whether we have a compelling interest to continue to use your data. In addition to other rights we have under law, we can continue to use your personal information following a request for restriction, where: (a) we have your consent; or (b) to establish, exercise or defend legal claims; or (c) to protect the rights of another natural or legal person.
- **Right to data portability:** To the extent that we process your information (i) based on your consent or under a contract; and (ii) through automated means, you have the right to receive such personal information in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller.
- **Right to object to the processing of your personal information:** If applicable, you can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.
- **Right to lodge a complaint with your local supervisory authority:** You have a right to lodge a complaint with your [local supervisory authority](#) if you have concerns about how we are processing your personal information. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.
- **How to Exercise Your Rights:** If the above rights apply to you and you would like to exercise them, please send us a request to privacy@notarize.com. In your message, please indicate the right you would like to exercise and the information to which it relates. Depending on the type of request, we may ask you for additional information to confirm your identity and for security purposes before disclosing to you any requested personal information. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. We will not always be able to fully address your request, for example if it would affect the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

11.4. *Cross-border Transfer of Information.* We maintain servers and systems in the United States hosted by third party service providers. As a result, where the personal information that we collect through or in connection with the Services is processed in the United States, we will take steps to ensure that the information receives the same level of protection as if it remained within the European Union/EEA. You have a right to receive details of any safeguards that we have where your data is transferred outside the European Union (e.g. to request a copy where the safeguard is documented, which may be redacted to ensure confidentiality).

11.5. *Retention.* We will keep your information in a secure manner, as set forth above. We will retain your data for the period necessary to fulfill the different purposes outlined in section 2, including without exception to meet legal, regulatory and contractual requirements. We will endeavor to maintain an accurate record of your dealings with us in the event of any complaints or challenges, and if we reasonably believe there is a possibility of legal action relating to your data or dealings.

12. CONTACT US.

Please do not hesitate to contact us if you have any questions about our Privacy Policy, our practices,

or to make a privacy related request. You can contact us at privacy@notarize.com. General feedback, including any complaints or compliments you wish to communicate to us should be submitted to support@notarize.com.

13. CHANGES TO THIS POLICY.

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Platform at <https://notarize.com/privacy/>. If we make any changes to this Policy that materially affect our data privacy practices with regard to the personal information which we have collected from you, we will provide you with notice in advance of such change.

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