

ATLAS TITLE COMPANY PRIVACY NOTICE - CALIFORNIA

Effective September 25, 2026

ATLAS Title Company ("ATLAS," "we," "us," or "our") is committed to protecting the privacy of California residents. This California Privacy Notice ("Notice") supplements the ATLAS Title Company Privacy Notice and describes how ATLAS collects, uses, discloses, and otherwise processes Personal Information relating to California residents.

This Notice is intended to provide California-specific information concerning our privacy practices and rights that may be available under California law. Certain information that ATLAS collects or maintains may be subject to exemptions under applicable federal or California law, including the Gramm-Leach-Bliley Act ("GLBA"), the California Financial Information Privacy Act ("FIPA"), and other applicable laws. Where an exemption applies, the applicable law will govern that information.

1. Personal Information We Collect

Depending on the nature of your relationship or transaction with ATLAS, we may collect the following categories of Personal Information:

- **Identifiers**, such as name, postal address, email address, telephone number, unique identifiers, account or file numbers, Social Security number, driver's license number, passport number, and other government-issued identification information;
- **Personal information described in California Civil Code § 1798.80**, including certain financial information, signature, physical characteristics or description, and other information associated with an individual;
- **Characteristics of protected classifications under California or federal law**, such as age, marital status, or other information when necessary for a transaction or as otherwise permitted by law;
- **Commercial information**, such as records of real estate transactions, property ownership, products or services purchased or considered, and transaction history;
- **Geolocation information**, if collected through our websites, applications, or services and permitted by applicable law;
- **Professional or employment-related information**, when necessary to provide our products or services;
- **Audio, electronic, visual, or similar information**, if collected in connection with our business operations or services;
- **Inferences**, if generated from information collected for purposes such as fraud prevention, security, analytics, or improving our products and services; and
- **Sensitive Personal Information**, where applicable, such as a Social Security number, driver's license number, financial account information, precise geolocation, or other information defined as sensitive personal information under applicable California law.

We may also collect information concerning real property, title, escrow, loan, and other real estate transactions. This may include information contained in public records, recorded documents, title records, transaction documents, and other information obtained in connection with providing title, escrow, settlement, or related services.

2. Sources of Personal Information

We may collect Personal Information from the following categories of sources:

- directly from you;
- from your agents or representatives;
- from other participants in a transaction;
- from lenders, mortgage brokers, real estate brokers and agents, attorneys, underwriters, escrow and settlement service providers, and other transaction participants;
- from affiliated and nonaffiliated service providers;
- from consumer reporting agencies, identity verification providers, fraud prevention services, and similar sources;
- from governmental entities and public records;
- from our websites, applications, electronic communications, and other online services; and
- from other persons or entities as permitted or required by law.

3. Business or Commercial Purposes for Collecting and Using Personal Information

ATLAS may collect and use Personal Information for the following business or commercial purposes:

- providing, administering, and improving our products and services;
- opening, processing, and completing title, escrow, settlement, and other real estate transactions;
- conducting title searches, examinations, and related research;
- preparing title commitments, policies, escrow instructions, settlement statements, deeds, deeds of trust, and other transaction-related documents;
- verifying identities and information;
- processing payments and disbursements;
- communicating with customers and other transaction participants;
- detecting, preventing, investigating, and responding to fraud, criminal activity, material misrepresentation,

- unauthorized activity, and security incidents;
- complying with applicable laws, regulations, legal processes, contractual obligations, and underwriting requirements;
- maintaining business and transaction records;
- performing accounting, auditing, quality assurance, compliance, risk management, and similar functions;
- operating, maintaining, securing, troubleshooting, and improving our websites, systems, and technology;
- conducting internal research and analysis;
- communicating with you concerning products and services offered by ATLAS, its affiliates, or business partners, where permitted by law; and
- performing other activities permitted or required by applicable law.

4. Disclosure of Personal Information

ATLAS may disclose Personal Information to the following categories of recipients for business or commercial purposes, as permitted or required by law:

- service providers and contractors that perform services on our behalf;
- affiliated companies;
- lenders, borrowers, buyers, sellers, real estate brokers and agents, attorneys, underwriters, escrow and settlement service providers, and other persons or entities involved in a transaction;
- financial institutions and payment processors;
- identity verification, fraud prevention, security, information technology, and other specialized service providers;
- governmental authorities, regulators, law enforcement agencies, courts, and other persons or entities as required or permitted by law;
- persons or entities to whom you direct or authorize us to disclose information; and
- persons or entities involved in a merger, acquisition, financing, sale or transfer of assets, reorganization, bankruptcy, receivership, or similar business transaction.

We may also disclose Personal Information when reasonably necessary to protect the rights, property, or safety of ATLAS, our customers, employees, or others, or to investigate or prevent fraud or other unlawful activity.

5. Sale or Sharing of Personal Information

ATLAS does not sell Personal Information for monetary or other valuable consideration and does not share Personal Information for cross-context behavioral advertising as those terms are defined by the CCPA.

Certain disclosures of Personal Information that are necessary to provide requested products or services, to process a transaction, or that are otherwise exempt under applicable law may not constitute a sale or sharing under the CCPA.

6. Retention of Personal Information

ATLAS retains Personal Information for as long as reasonably necessary to provide our products and services, complete and maintain transaction records, comply with legal, regulatory, accounting, recordkeeping, contractual, and underwriting requirements, resolve disputes, prevent fraud, enforce agreements, and fulfill other legitimate business purposes. The length of time we retain information depends on the nature of the information and the purposes for which it was collected.

7. California Privacy Rights

Subject to applicable law and any applicable exemptions, California residents may have the following rights concerning their Personal Information:

Right to Know

You may have the right to request information concerning the categories of Personal Information ATLAS has collected, the categories of sources from which it was collected, the purposes for which it was collected or used, the categories of third parties to whom it was disclosed, and, where applicable, the specific pieces of Personal Information ATLAS has collected about you.

Right to Delete

You may have the right to request deletion of Personal Information that ATLAS has collected from you, subject to exceptions permitted or required by law.

For example, ATLAS may be required or permitted to retain information to complete a transaction, provide requested services, comply with legal or regulatory requirements, maintain transaction or business records, detect or prevent security incidents or fraud, or exercise or defend legal claims.

Right to Correct

You may have the right to request correction of inaccurate Personal Information maintained by ATLAS, subject to applicable law and any applicable exceptions.

Right to Limit Use of Sensitive Personal Information

California residents may have the right to limit certain uses and disclosures of Sensitive Personal Information to the extent provided by applicable law.

ATLAS may use Sensitive Personal Information for purposes permitted by applicable law, including purposes necessary to provide requested products and services, prevent fraud, ensure security, comply with legal obligations, and perform other activities permitted by the CCPA.

Right to Non-Discrimination

ATLAS will not discriminate against a California resident for exercising a privacy right available under applicable law.

8. How to Exercise California Privacy Rights

If applicable California law provides you with a privacy right described in this Notice, you may submit a request by contacting ATLAS through the following methods:

Email: privacy@AtlasTitleCo.com

Telephone: (888) 809-9714

Mail: Atlas Title Company

Attn: Privacy

1 Corporate Park, Suite 100

Irvine, CA 92606

ATLAS may need to verify your identity before completing certain requests. The verification process may depend on the nature and sensitivity of the information involved and the type of request submitted.

If you submit a request through an authorized agent, ATLAS may require appropriate documentation establishing the agent's authority to act on your behalf, as permitted by applicable law.

ATLAS will respond to privacy requests within the time periods required by applicable law.

To the extent required by applicable California law, ATLAS will recognize a valid Global Privacy Control ("GPC") signal as an opt-out request concerning the sale or sharing of Personal Information.

9. Financial Information and Other Exempt Information

Certain Personal Information collected by ATLAS may be subject to federal or California financial privacy laws, including the Gramm-Leach-Bliley Act and the California Financial Information Privacy Act, rather than the CCPA.

Information that is subject to an applicable statutory or regulatory exemption will be handled in accordance with the laws applicable to that information.

Nothing in this Notice limits or replaces any privacy notice or disclosure that ATLAS is required to provide under applicable federal or California financial privacy laws.

10. Publicly Available Information

ATLAS may collect and use information that is publicly available, including information contained in governmental and public records concerning real property, property ownership, recorded documents, liens, judgments, and real estate transactions.

Information that is publicly available may be treated differently under applicable privacy laws.

11. Children's Information

ATLAS's websites and online services are not directed to children under 18. ATLAS does not knowingly collect Personal Information online from children under 18. If we learn that we have collected Personal Information online from a child under 18, we will take reasonable steps to delete the information, subject to applicable law.

12. Accessibility

ATLAS is committed to providing privacy information in an accessible manner. If you need this Notice in an alternative format because of a disability, please contact us using the information provided below.

13 . Changes to This California Privacy Notice

ATLAS may update this California Privacy Notice from time to time to reflect changes in our privacy practices, products or services, technology, or applicable laws.

When we make changes, we will post the updated Notice on our website and update the effective date shown at the beginning of the Notice.

Accessing and Correcting Information; Contact Us

If you have questions or would like to correct your Personal Information, contact us by phone at (888) 809-9714, by email at privacy@AtlasTitleCo.com, or by mail to:

Atlas Title Company
1 Corporate Park, Suite 100
Irvine, CA 92606
Attn: Chief Privacy Officer