

# ClosingWTF - Privacy Notice

Last Updated: November 17, 2024

ClosingWTF, Inc., a Delaware corporation (hereinafter, “ClosingWTF,” “we,” “us,” and/or “our”) owns and operates the ClosingWTF proprietary online hosted software platform (the “Platform”), available at <https://closing.wtf> (the “Site”), which enables users to analyze their mortgage and other related information (the “Service”).

When we refer to the “Services” throughout this Privacy Notice, we mean the Platform, Site, Service, and any related services provided by us through or in connection with the use of the Service.

**Please read this Privacy Notice carefully.** It provides important information about your personal information and tells you about your rights under applicable privacy laws. If you have any questions, comments, or concerns regarding this Privacy Notice and/or our data practices, please [contact us](#).

BY ACCESSING OR USING THE SERVICES (OR ANY PART THEREOF), OR SUBMITTING INFORMATION IN CONNECTION WITH YOUR USE OF THE SERVICES (OR ANY PART THEREOF), YOU ACKNOWLEDGE AND AGREE THAT YOU HAVE READ THIS PRIVACY NOTICE.

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## **1. Changes to this Privacy Notice**

ClosingWTF reserves the right to update or modify this Privacy Notice at any time. Except for material changes as described below in this Section, all updates and modifications to these documents will be effective from the day they are posted on the Site available [here](#), as indicated by the “Last Updated” date set forth above. If we make any material changes to this Privacy Notice, we will provide you reasonable prior notice of these changes by posting a prominent notice on the Site and/or through the user-interface of the Platform, and if we have an email address on file for you, we may notify you of these changes by sending a notification to the applicable email address. Material changes to this Privacy Notice will become effective on the date set forth in the notice. It is your responsibility to regularly visit and review this Privacy Notice. If you do not agree to any updates or modifications to the Privacy Notice, terminate your Account and cease all use of the Services. Your continued use of the Services after the applicable effective date of the revised Privacy Notice (set forth above), signifies to us that you acknowledge and agree to be bound by the revised Privacy Notice.

## **2. Information We Collect**

The term “personal information” or “personal data” means any information about an individual from which that person may be identified. For example, it may include a person’s name, home address, telephone number, email address, or payment information, and in some jurisdictions, IP address. It does not include data from which the identity of an individual has been definitively removed along with any identifiers connected to such individual (also known as anonymous or anonymized data).

How and what personal information we collect in connection with the use of the Services depends on how and why you use the Services.

In some instances, we collect information directly from you as explained in the Section [Information Provided Directly to ClosingWTF](#), and in others, we may receive information from third parties (which may include other users of the Services) as explained in the Section [Information Collected From Third Parties](#). In addition, in certain circumstances, you will not provide any information to us directly, in which case we automatically collect certain information as explained [Information Collected Indirectly](#).

#### **a. Information Provided by You Directly to ClosingWTF**

The personal information we collect directly from you depends on how and why you use the Services. For instance, the information that you provide when you visit and/or browse the Site or sign up for our marketing communications is more limited than the information you provide when you register an account to use the ClosingWTF Services (an “**Account**”).

Please be advised that we may ask you to update your information from time to time in order to keep it accurate.

- i. **Account & Registration Information:** When you register an Account, ClosingWTF may collect the following personal information directly from you:
  - Your identity (including your first name and last name);
  - Home address;
  - Your email address; and/or
  - Your username, password and/or other login credentials.
- ii. **Identity Verification:** In order to use certain features or functionality of the Services, we may ask you to provide a current photo of your face and a government issued ID for identity verification purposes. ClosingWTF does not directly collect, store, or process this information, rather, we use third party identity verification services integrated into the Services that collect and process this information and provide us notification that the identity was either verified or was not able to be verified.
- iii. **Other Information You May Provide Us:** In addition to the above scenarios, there may be certain features of the Services which allow you to provide additional information to us directly, which may include:
  - Your name (first and last) and/or email address, when you sign up for our marketing communications and/or newsletters; and/or
  - Information, data, content, documents and/or materials you provide to us when you fill out forms, answer surveys, or contact us (such as your feedback, requests for support, or other communications with us).

#### **b. Information Collected from Third Parties**

In some instances, we may process and/or receive personal information from third parties, which consists of:

- **Service Providers:** Data from our service providers (for example, our identity verification providers may tell us whether the photos and/or identification documentation you provided to them was or was not able to be verified).
- **CPAs Engaged by You:** Information from a third-party certified public accountant (“**CPAs**”) that you have been connected to through the Services (at your request), and that you have engaged with to provide you certain accredited investor verification services.
- **Third Party Integrations:** Data and information from third party products and services, including, without limitation, financial institutions and/or cryptocurrency wallet and/or exchange data products, services and/or integrations, that you connect with and/or use in connection with the Services (collectively, “**Third Party Integrations**”).

For example, if you connect your cryptocurrency wallet account in connection with your use of the Services, we may receive your financial account information and data, including (a) account name, account type and public wallet or deposit addresses, (b) information related to account balances, account transactions, in both amounts and in other currency equivalents (e.g. US Dollars), (c) information about account transactions, including amount, date, time, type, location, price, cost basis, fees, quantity, sender and recipient and (d) information about you as the account owner.

## **c. Information Collected Indirectly**

### **i. Usage Information**

We, or our authorized third-party service providers, automatically collect technical and/or analytics information about how you use and/or interact with our Services (collectively, “Usage Information”).

Usage Information that we collect consists of information about our users’ interactions with the Services, and is collected while you are using and/or accessing the Services. Usage Information may include (but is not necessarily limited to) information about the device and/or platform (e.g., iOS or Android), and/or the web browser, used by you to interact with and/or access the Services, your IP address, access dates and times, information about your approximate location (as determined through your IP address), device information, device event information, crash data, and log files and data.

Usage Information allows ClosingWTF to understand how users are interacting with and using the Services (which may include administrative and support communications with us), and other actions taken in connection with the use of the Services. We use this information for our internal purposes, specifically to operate, maintain, secure and improve the Services.

Typically, all Usage Information is collected in anonymous form and does not identify you personally. To the extent any Usage Information is linked or tied to personally identifiable information, such information is deemed “personal data” and we will use it and protect it in accordance with this Privacy Notice.

We may also use this information to provide you with notifications, recommendations, and information about specific features of the Services and/or additional products, services, or features we believe may be of interest to you.

### **ii. Cookies and Similar Technologies**

We or authorized third parties may collect certain information (including, without limitation, Usage Information) by automated means using technologies such as cookies, web beacons, embedded scripts, pixels, browser analysis tools, server logs, and mobile identifiers, and similar technologies that are deployed, and typically stored on your device and have a unique identifier, when you visit a website, when you open an email or click on links or images within an email, and/or when you interact with online advertisements. **While ClosingWTF employs these technologies throughout its Services, ClosingWTF does not track users across third party websites.**

These technologies may be used for many different purposes. For example, they can be used to show that you have previously visited and/or used a feature of the Services and to identify which parts of the Services you might be most interested in, or used to improve your online experience by storing your preferences during your visit and/or use of the Services. These technologies can also be used for security, fraud detection and authentication purposes.

In many cases, the information we collect using these technologies is only used in a non-identifiable manner without reference to personal information. For example, we may use information we collect to better understand website traffic patterns and to optimize user experience. In other cases, we associate the information we collect using cookies and other technology with your personal information.

We may use certain third party analytics tools to help us gather certain information when you visit and/or access the Services (including, Usage Information). For example, we use Google Analytics on the Site. For more information on how these technologies are used by Google, please refer to: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

For information regarding how you can manage your cookie preferences, please see [Cookie Preferences](#) below.

### **a. Aggregated Data**

With the personal information and other data (including, Usage Information) collected by us, we process “Aggregated Data”, such as statistical or demographic data. Aggregated Data may be derived from personal information, but is not considered personal information under the law if it does not directly or indirectly reveal your identity. If we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information, which will be processed in accordance with this Privacy Notice.

### 3. Payment Processing

We do not collect any payment information in connection with the use of the Services.

### 4. Sensitive Data

Except for the photos collected to verify your identity, which may include biometric data, as described [above](#), ClosingWTF does not require you to provide any other sensitive data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or health and genetics to use the Services.

### 5. Children's Privacy

ClosingWTF does not target the Services to persons under the age of 18 and does not knowingly collect personal information from persons under the age of 18. Therefore, we ask you not to provide us with personal information of persons under the age of 18. If we learn that personal information of persons under 18 years of age has been collected on or through the Services, then we may deactivate the account or otherwise terminate access to the Services and/or make the content and/or information inaccessible.

### 6. How ClosingWTF Uses Personal Information

Our mission is to provide safe, efficient and high-quality services, and we, or our authorized third-party service providers who assist us in providing the Services, process your personal information for this purpose. Depending on how you use the Services, we use your personal information in the following instances:

- To provide the Site to you and other visitors;
- To perform and provide the Services to you and other users;
- To perform identity verification;
- To enable Third Party Integrations that you choose to connect and/or use with the Services;
- To deliver direct marketing communications regarding our products and services that we may think are of interest to you;
- To respond to your queries and requests, or otherwise communicate directly with you;
- To detect any fraudulent or illegal activity against you, our other users, and/or ClosingWTF and our partners;
- To perform system maintenance and upgrades, and enable new features;
- To enforce and/or protect our rights and the rights of others;
- To comply with a legal or regulatory obligation (for example, keeping records of our sales for tax compliance); and
- To provide information to regulatory bodies when legally required, and only as outlined below in the Section title "*Required Disclosures – Responding to Legal Orders*" under [Legal Obligations, Required Disclosures, and Exigent Circumstances](#).

### 7. Sharing Personal Information

Aside from disclosing your information to those of our personnel who are authorized to process the information in order to provide the Services and who are committed to confidentiality, we disclose your personal information only to the third parties as described below.

#### a. Third-Party Service Providers

We share personal information with third parties that provide services to us that help us in the operation, provision, administration and management of the Services ("**Service Providers**"), and to otherwise operate our business. Depending on how you use the Services, the following categories of third parties collect data on our behalf or receive personal information:

- Hosting services providers,
- Analytics providers,
- Identity verification providers,
- Advertising and marketing partners for our direct marketing purposes,
- Providers of business operations and communication tools,
- Other third-party service providers that help us provide features and functions for the Services (e.g., customer support providers), and
- Professional service providers, such as auditors, lawyers, consultants, accountants and insurers.

For a list of all Service Providers we use, please [contact us](#). We require all Service Providers to respect the security of your personal information and to treat it in accordance with the law.

#### **b. Third Party Integrations**

When you interact with and/or use Third Party Integrations in connection with the Services, certain data and information may be exchanged between us and the provider of the applicable Third Party Integration. Note that the Third Party Integrations you choose to interact with and/or use are not our Service Providers. The applicable providers of Third Party Integrations may use your personal information differently than we do and we do not control their use of your information. Please review the privacy notices for the Third Party Integrations. We currently enable the use of the following Third Party Integrations:

- Anthropic: <https://www.anthropic.com/legal/privacy>

#### **c. To Third Parties at Your Request**

There may be certain functionalities and/or features of the Services that permit you to export reports that include certain details of your financial account information and/or verifications (the “**Reports**”) and/or share your Reports with third parties, including, but not limited to, a CPA that you have engaged with. If you request to share your Reports and/or any other information with any third parties through the Services using such features, we will share your Reports and/or information with such third parties.

Note that the third parties (including, but not limited to, any CPAs) with whom you choose to share your Reports and/or other information are not under our control, and are not our Service Providers. If you choose to share your Reports and/or other information with those third parties, they may use your personal information differently than we do, and we do not control their use of your personal information, or the use of the Reports and/or other information. Please make your choice to share your Reports and/or other information carefully and review the privacy notices of all other third parties you decide to share your information with, if applicable.

ClosingWTF will not be able to contain or retrieve the Reports and/or other information (including any personal information contained therein) once it has been shared or disclosed, and ClosingWTF will have no responsibility or liability for any consequences that may result because you have released or shared the Reports and/or other information (including and personal information contained therein) with others.

#### **d. Business Transfers**

We may also share data with third parties to whom we choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Notice.

#### **e. Affiliates and Subsidiaries**

Personal information that we collect about you through the Services may be shared with the employees, contractors, and agents of ClosingWTF and our affiliated and subsidiary entities (“**Affiliates**”) who are involved in providing or improving the Services that we offer to you. We obligate the employees, contractors and agents of ClosingWTF and our Affiliates to ensure the security and confidentiality of your personal information and to act on that personal information only in a manner consistent with this Privacy Notice.

#### **f. Legal Obligations and Security**

##### Regulatory and Government Bodies – Compliance with Law

We may disclose your information to regulatory agencies and official government bodies, as required to comply with or satisfy any laws, rules, or regulations applicable to ClosingWTF.

##### Required Disclosures – Responding to Legal Orders

If we are required to disclose personal information by law, such as pursuant to a subpoena, warrant or other judicial or administrative order, our policy is to respond to requests that are properly issued by law enforcement within the United States. Under such circumstances, unless prohibited by applicable law, we will attempt to provide you with prior notice that a request for your personal information has been made in order to give you an opportunity to object to the disclosure. We will attempt to provide this notice by email, if you have given us an email address. However, government requests may include a court-granted non-disclosure order, which prohibits us from giving notice to the affected individual. In cases where we receive a non-disclosure order, we will notify you when it has expired or once we are authorized to do so.

### Exigent Circumstances & Enforcement/Protection of Our Rights

Your information, including the contents of all of your online communications in our Services and between you and ClosingWTF may be accessed and monitored as needed to provide our Services and may be disclosed to law enforcement, regulatory agencies, official government bodies, and other third parties, as we, in our sole discretion, believe necessary or appropriate:

- To enforce our rights under the [ClosingWTF Terms of Service](#) and/or any other agreements we have entered into with you for access and/or use of the Services;
- In connection with an investigation of fraud, intellectual property infringement, piracy or other unlawful activity or activity that may expose us or our affiliates, partners and/or agents to legal liability; and/or
- If we receive information that provides us with a good faith belief that there is an exigent emergency involving the danger of death or serious physical injury to a person.

#### **g. With your Consent**

There may be situations where you are asked to consent to share personal information with third parties for additional reasons not included in this Privacy Notice. In such event, we will only share such personal information if we have received your prior consent and only for the purposes as listed in the request to share such information.

### **8. Marketing Communications**

If you are a registered user and have not otherwise opted out (or with your consent where required by applicable law), or if you have opted in to receive direct marketing emails from us, we may use your personal information to send you marketing information about the Services, other ClosingWTF products and services, new product releases, and new feature releases of the Services that we think may interest you. We carry out direct marketing by email.

If you no longer wish to receive marketing communications, you have the right at any time to opt out as further explained in [Your Choices](#).

### **9. Your Choices**

#### **a. Accessing, Updating and Correcting Personal information**

If you would like to correct or update certain personal information (such as your contact information), you can update this information in your Account settings page. If there is other information that you have provided to us you wish to correct and/or update please [contact us](#) and we will use reasonable efforts to correct and/or update such information.

#### **b. Direct Marketing**

You may manage the receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any of our marketing e-mails. We will use commercially reasonable efforts to process such requests in a timely manner. Note that you cannot opt out of receiving transactional e-mails or communications related to the Services (e.g., requests for support), which, for clarification, are not marketing communications.

#### **c. Cookie Preferences**

Where required by applicable law, we will obtain your consent prior to setting cookies (except for strictly necessary cookies). Most web and mobile device browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set.

In order to manage your cookie preferences, you may alter the cookie settings in your browser settings at any time. You may accept all, or certain, cookies. If you do disable our cookies in your browser settings, you may find that certain features and/or functionality of the Services do not work.

To learn more about cookies, including how to manage cookies and opt-out of cookies being placed on your device, please visit <http://www.allaboutcookies.org/manage-cookies/index.html>.

While tracking is widespread over the internet, there are things you can do to minimize these activities with respect to browser cookies.

### Do Not Track Settings

You may turn on the Do Not Track (“DNT”) setting in your browser, which will enable your browser to send a special signal to websites, analytics companies, plug in providers, and other web services you encounter while browsing to stop tracking your activity. To turn on your DNT signal, please visit <https://allaboutdnt.com/#adjust-settings>. Please note that not all companies will respond to or honor DNT signals.

Note that ClosingWTF does not process or respond to web browsers' "do not track" signals or other similar transmissions that indicate a request to disable online tracking of users who use the Services.

## 10. Third Party Social Plug-Ins

On or through the Services, we provide third-party “share” buttons which enable you to share certain content via social media sites (e.g., Facebook, Twitter, Instagram, YouTube, and LinkedIn). These “share” buttons may function as web beacons when you interact with the button. Please note that when you “share” using the buttons, you may send to the third party provider of the “share” button the information that you are viewing. If you are not logged into your account with the third party provider, then the third party may not know your identity. If you are logged in to your account with the third party, then the third party may be able to link information or actions about your interactions with the Services to your account with the applicable third party provider. Please refer to each third party’s privacy policies to learn more about its data practices.

## 11. External Websites

On or through the Services, we may provide or make available, for informational purposes only, links to other websites or resources with which we do not have a contractual relationship and over which we do not have control (“**External Websites**”). Such links are not paid advertisements, nor do they constitute an endorsement by ClosingWTF of those External Websites, and are provided to you only as a convenience. By clicking on links to External Websites, the operators of the External Websites may collect your personal information. We are not responsible for the content or data collection practices of those External Websites, and your use of External Websites is subject to their respective terms of use and privacy policies.

## 12. Data Retention

Personal information is processed for the period necessary to fulfill the purposes for which it is collected (for example, in connection with the Services provided to you pursuant to the applicable terms and/or agreement entered into with ClosingWTF for such Services), to comply with legal and regulatory obligations and for the duration of any period necessary to establish, exercise or defend any legal rights.

## 13. Data Security and Protection

We have put in place reasonable and appropriate security measures designed to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. For example, we use encryption, secure socket layer, firewalls, and password protection. In addition, we limit access to personal information to those employees, agents, contractors and the third parties who have a need-to-know the information.

We also have procedures in place to deal with any suspected data security breach. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure, and while we take reasonable steps to provide secure services, by using the Services, you understand and assume the risks associated with your activities on the internet.

In addition, you have responsibility and control over protecting your personal information. For example, you, and not ClosingWTF, are responsible for safeguarding your password, and other authentication information you use to access the Services. You should not disclose your password and/or authentication information to any third party and should immediately [contact us](#) of any unauthorized use of your password or you have reason to believe that your information and/or Account is no longer secure.

**In addition, as described in this Privacy Notice, ClosingWTF cannot secure, and has no responsibility for, any personal information that you share or release on your own or that you request us to share or release.**

## 14. California Privacy Rights - Shine the Light

ClosingWTF does not share your personal information with any unaffiliated third party for its direct marketing purposes without your express consent.

California residents who have provided us with personal information have the right (under California Civil Code § 1798.83) to request and obtain from us, once each year, the details of any personal information we shared with a third party for that third party's direct marketing purposes during the prior calendar year. The details would include the categories of personal information and the names and addresses of the third party with which it was shared.

To request information about this sharing, you may submit a request with "Your California Privacy Rights" in the subject line, along with your first and last name, and complete mailing address (including street address, city, state, and zip code) by either: sending an email message or writing to us at the email and/or mailing address specified in the [How to Contact Us](#) Section.

If you do not submit and send your request with complete information as set forth above, we will not process it.

## 15. Nevada Privacy Rights

Under Nevada law, certain Nevada residents may opt out of the sale of covered personal information (which includes first and last name, address, email address, phone number, Social Security Number, or an identifier that allows a specific person to be contacted either physically or online) to a person for that person to license or sell such information to additional persons.

ClosingWTF does not currently sell your covered information as defined under applicable Nevada law; however, you may submit an opt-out request, which we will honor as required by Nevada law should we engage in such a sale in the future.

You may submit an opt-out request by sending an email message or writing to us at the email and/or mailing address specified in the [How to Contact Us](#) Section; along with your full name, any user name, and complete mailing address (including street address, city, state, and zip code), email address (so that we can contact you, if needed, in connection with the request) and confirmation that you are a Nevada resident.

You must provide us with information reasonably requested by us to verify your identity and the authenticity of the request. We typically process these requests within 60 days from the day we receive it (and will notify you within that period if we need an additional 30 days to do so).

## 16. Notice to Users Outside the United States

ClosingWTF is based in the United States. The personal information that we collect are sent to and stored on servers located in the United States. Such storage is necessary in order to process the information. ClosingWTF may transfer the personal data that we collect from you to our other offices and/or to the third parties mentioned in the circumstances described above, which may be situated outside of your country or regional area, and may be processed by staff operating outside of your country or regional area. In particular, information provided to us or collected by us likely will be transferred to and processed in the United States by us or our Affiliates and our respective agents and contractors. The data protection laws of the United States or other countries may not be as comprehensive or equivalent to those in your country of residence.

## 17. How to Contact Us

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us as follows:

By email at: [privacy@closingwtf.com](mailto:privacy@closingwtf.com); *Subject Line:* Privacy Request

By mail at: ClosingWTF, Inc.  
Attn: ClosingWTF Privacy Request  
2261 Market Street STE 22681  
San Francisco, CA 94114