CLOSINGTRAK™ PRIVACY POLICY

Last Updated: August 16, 2026

CALIFORNIA NOTICE AT COLLECTION

KLM Technologies, LLC ("KLM," "we," "us," or "our") collects the categories of personal information described below, including identifiers and contact information; professional and account information; internet, device, cookie, and usage information; approximate location derived from an IP address; authentication and security information; marketing and event information; commercial, invoicing, and accounting records; and inferences used for analytics or advertising. We use this information to provide and secure our services, communicate with customers and users, administer subscriptions and invoices, analyze and improve performance, conduct marketing and events, deliver targeted advertising on public websites, comply with law, and protect our rights.

We may disclose these categories to service providers, analytics providers, advertising platforms and networks, customers and account administrators, event or marketing partners, professional advisers, government authorities, and parties to a business transaction, as described in this Policy. We do not sell personal information for money. Our targeted advertising may constitute "sharing" under California law. Use the "Your Privacy Choices" link in our website footer or cookie-consent manager to opt out of sale, sharing, or targeted advertising, and enable Global Privacy Control ("GPC") in a supported browser to send an opt-out preference signal.

We retain personal information only for as long as reasonably necessary for the purposes described in this Policy, including the category-specific criteria in Section 7. We do not use or disclose sensitive personal information for purposes that require a right to limit under California law. More information appears throughout this Policy.

1. SCOPE AND OUR ROLES

This Privacy Policy explains how KLM collects, uses, discloses, and retains personal information through closingtrak.com and other websites that link to this Policy, the ClosingTrak™ web platform, the downloadable ClosingTrak Go™ mobile application, and related support, marketing, and business activities (collectively, the "Services").

The Services are offered to title companies and their authorized personnel for business use. This Policy does not apply to KLM workforce or applicant information, which should be addressed in a separate workforce privacy notice, or to websites, products, and services that KLM does not control.

KLM acts in different privacy roles. For account, website, marketing, event, support, analytics, and KLM billing-administration information, KLM generally determines why and how the information is processed. For buyer, seller, and closing-related information submitted by a title-company customer ("Customer Data"), the customer generally controls the processing and KLM processes the information on the customer's behalf under the Customer Agreement and any data processing addendum.

If you are a buyer, seller, or other transaction participant seeking to exercise rights concerning Customer Data, contact the title company handling your transaction. We will assist the customer as required by contract and applicable law. Sections describing KLM-controlled information do not change the customer's control of Customer Data.

2. PERSONAL INFORMATION WE COLLECT

2.1 Customer Data

Customers and their authorized users may submit buyer and seller names, contact details, property addresses, closing dates, scheduling notes, and related operational information. KLM processes Customer Data only to provide, secure, support, maintain, and improve the Services; follow documented customer instructions; comply with law; and enforce applicable agreements. Customer Data is not used for cross-context behavioral advertising.

Unless expressly authorized in a written Customer Agreement, the Services are not intended to store Social Security numbers, driver's-license or government-identification numbers, bank or payment-card information, wire instructions, medical information, biometric information, or other highly sensitive or regulated information.

2.2 Information You Provide Directly

- Contact and professional information, such as name, business name, job title, mailing address, email address, and telephone number.
- Account and profile information used to register, administer, and support an account.
- Support requests, survey responses, correspondence, and other information you choose to provide.
- Newsletter, whitepaper, webinar, event, and other marketing-registration information.
- Customer billing contacts, subscription selections, invoice details, and accounting records. Subscription invoices may be generated in ClosingTrak™, while payment is administered separately through QuickBooks or another designated billing service. KLM does not collect or store credit-card numbers, bank-account credentials, or tax-identification numbers through ClosingTrak™.

2.3 Information Collected Automatically

- Device and network information, such as IP address, browser type, operating system, device type, device identifiers, application version, language, and general or approximate location derived from an IP address. We do not collect precise device location.
- Usage and diagnostic information, such as login times, pages or screens viewed, links and features used, workflow actions, referring and exit pages, clickstream information, session duration, crash reports, and error logs.
- Cookie, pixel, software-development-kit, and related technology information used for authentication, preferences, analytics, measurement, and advertising on public websites.
- Identifiers generated for accounts, users, devices, sessions, and security events.

2.4 Authentication and Security Information

We process password hashes, session tokens, authorization records, audit logs, and telephone numbers used for SMS-based multifactor authentication. We do not offer Google social login, company single sign-on, or other third-party account integrations unless this Policy is updated to reflect that practice.

2.5 Information From Other Sources

We may receive business contact, professional, demographic, and marketing information from customers, account administrators, event partners, public sources, business partners, analytics providers, advertising platforms, and other vendors. We may combine it with information collected through the Services for the purposes described below.

3. HOW WE USE PERSONAL INFORMATION

- Provide, configure, administer, maintain, and support the Services and user accounts.
- Authenticate users, deliver SMS-based multifactor authentication, prevent fraud and abuse, investigate incidents, enforce terms, and protect the Services and users.
- Respond to support requests and communicate about accounts, subscriptions, product changes, security, and policy updates.
- Generate invoices, administer subscriptions, maintain accounting records, and coordinate payment through QuickBooks or another designated billing service.
- Analyze performance and usage through tools including Google Analytics and Amplitude; troubleshoot errors; test features; and improve the Services.
- Operate newsletters, whitepapers, webinars, events, surveys, and other marketing activities; evaluate campaigns; and develop business relationships.
- Use advertising pixels and advertising networks to measure and deliver targeted or cross-site advertising concerning ClosingTrak™ on public websites, subject to consent and opt-out choices.
- Create aggregated or de-identified information and use it for lawful analytics, research, security, service improvement, and business planning. We will not attempt to re-identify it except to test de-identification or as permitted by law.

- Comply with legal obligations, respond to lawful requests, establish or defend legal claims, and protect KLM, customers, users, and others.
- Carry out another disclosed purpose with your direction or consent.

4. HOW WE DISCLOSE PERSONAL INFORMATION

- Service providers and contractors that provide hosting, infrastructure, support, communications, SMS authentication, analytics, security, invoicing, accounting, marketing, and other business services.
- Analytics and advertising providers, including Google Analytics, Amplitude, advertising platforms, pixels, and ad networks. On public websites, these disclosures may constitute a sale or sharing under some state privacy laws even when no money is exchanged.
- The customer and its account administrators, who may manage accounts, permissions, audit activity, and Customer Data. Authorized users may see information shared through collaborative Service features.
- Event sponsors, webinar partners, and other attendees when disclosed at registration or with consent. We will not provide contact information to a marketing partner for its independent marketing unless the disclosure is described at collection or otherwise permitted by law.
- Professional advisers, auditors, insurers, and similar parties when reasonably necessary to obtain services or protect legal rights.
- Government authorities, law enforcement, courts, regulators, or other persons when reasonably necessary to comply with law, respond to legal process, protect rights or safety, investigate wrongdoing, or enforce agreements.
- A buyer, investor, lender, adviser, or other participant in an actual or proposed merger, financing, acquisition, reorganization, bankruptcy, or sale of assets, subject to appropriate safeguards.
- Other recipients at your direction, with your consent, or as otherwise disclosed when information is collected.

5. COOKIES, ANALYTICS, AND TARGETED ADVERTISING

We and our vendors use cookies, pixels, mobile technologies, and similar tools. Strictly necessary technologies support security, authentication, preferences, and core functions. Analytics technologies, including Google Analytics and Amplitude, help measure how websites, applications, and platform features are used. Advertising technologies and networks may collect identifiers, device information, and browsing activity on public websites to measure campaigns and deliver targeted or cross-site advertising.

Use our cookie-consent manager or the “Your Privacy Choices” link to review available categories and change non-essential cookie or targeted-advertising choices. A choice may apply only to the browser and device on which it is made. Where required, we recognize GPC as a request to opt out of sale, sharing, or targeted advertising. You may need to enable GPC separately in each browser or device.

We do not respond to legacy “Do Not Track” signals because no uniform legal standard governs them. GPC is a separate opt-out preference signal that we process as described above. Additional details should be maintained in a Cookie Notice that identifies current cookies, software development kits, vendors, purposes, and retention periods.

6. YOUR CHOICES

- Account information. Use available account settings or contact the customer’s administrator or support@closingtrak.com to update account information.
- Marketing communications. Use the unsubscribe link in marketing email. You may still receive transactional, security, support, and account communications.
- Cookies and targeted advertising. Use the cookie-consent manager, the “Your Privacy Choices” link, or GPC as described in Section 5.
- Customer Data. Contact the title company handling the transaction. KLM may need to refer a request to that customer.
- State privacy requests. Email privacy@closingtrak.com and describe the right you wish to exercise. We may verify identity and authority before responding.

7. RETENTION

We retain personal information only as long as reasonably necessary for the disclosed purposes, considering the amount, nature, sensitivity, and risk of the information; the relationship and requested Services; legal, accounting, and contractual requirements; security and fraud-prevention needs; and applicable limitation periods. Our principal criteria are:

- Customer Data: for the Customer Agreement term and the export, backup, return, deletion, and legal-compliance period specified by customer instructions, contract, and KLM's documented retention schedule.
- Account, authentication, audit, and security records: while an account is active and afterward for security, dispute-resolution, enforcement, and legal-compliance needs.
- Support and business correspondence: until the matter is resolved and for a reasonable period needed for service history, quality, disputes, and legal compliance.
- Invoices, subscription records, and accounting information: for the period required by applicable tax, accounting, audit, and recordkeeping requirements.
- Marketing and event information: until consent is withdrawn, an opt-out is received, information is no longer useful for the disclosed purpose, or a longer period is required by law. Suppression records may be retained to honor opt-outs.
- Cookies, analytics, advertising identifiers, and usage information: according to the Cookie Notice, consent-manager settings, vendor configurations, and the period reasonably necessary for analytics, security, measurement, and legal compliance.
- Backups: until overwritten or deleted under normal backup cycles, unless longer retention is required by law or reasonably necessary for security or disaster recovery.

8. SECURITY

We maintain reasonable administrative, technical, and physical safeguards designed to protect personal information. Safeguards may include access controls, authentication, logging, vendor management, encryption where appropriate, security monitoring, incident response, and workforce policies. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. Customers and users must protect credentials, use available security features, and promptly report suspected unauthorized access to support@closingtrak.com.

9. U.S. STATE PRIVACY RIGHTS

Depending on your state, KLM's role, applicable thresholds, and legal exemptions, you may have rights to confirm processing; access, correct, delete, or obtain a portable copy of personal information; opt out of sale, targeted advertising, or certain profiling; limit certain uses of sensitive personal information; and appeal a refusal to act. You may also have the right not to receive discriminatory treatment for exercising a privacy right.

Submit a request or appeal to privacy@closingtrak.com. State that your message is a "Privacy Rights Request" or "Privacy Appeal," identify your state, describe the request, and provide enough information for us to locate relevant records. We will use reasonable methods to verify identity and authority. An authorized agent may submit a request where permitted, but we may require evidence of authority and direct verification with the individual.

If a request concerns Customer Data, we may direct you to the relevant title-company customer because KLM processes that information on the customer's behalf. Legal rights and exemptions, including exemptions for information governed by the Gramm-Leach-Bliley Act or other sector-specific laws, vary by state and data type.

9.1 California Residents

The California Consumer Privacy Act ("CCPA") may provide rights to know the categories and specific pieces of personal information collected; know sources, purposes, and recipients; access or obtain a copy; correct; delete; opt out of sale or sharing; limit certain uses or disclosures of sensitive personal information; and receive equal treatment. We do not sell personal information for monetary consideration. We may "share" identifiers, internet or electronic-network activity, commercial information, and inferences with advertising platforms and networks for cross-context behavioral advertising on public websites. Use "Your Privacy Choices" or GPC to opt out.

During the preceding twelve months, KLM may have collected the categories described in Section 2 and disclosed them for the business and commercial purposes described in Sections 3 and 4. The categories include identifiers and contact information; professional information; commercial and invoicing information; internet or electronic-network activity; approximate geolocation derived from IP address; authentication and account-access information; and inferences used for analytics or advertising. KLM does not use or disclose sensitive personal information for purposes that require a right to limit.

California requests may be submitted to privacy@closingtrak.com or through any additional request method identified on closingtrak.com. We will confirm and respond within the periods required by law. We may deny or limit a request where an exception applies and will explain the basis when required. Authorized-agent requests are subject to verification requirements.

California "Shine the Light." KLM does not disclose California customers' personal information to third parties for those third parties' own direct-marketing purposes as contemplated by California Civil Code Section 1798.83.

9.2 Colorado and Other Universal Opt-Out States

Where applicable, we process recognized universal opt-out signals, including GPC, as requests to opt out of targeted advertising or sale. Colorado residents and residents of certain other states may appeal a decision concerning a rights request by emailing privacy@closingtrak.com with "Privacy Appeal" in the subject line.

9.3 Nevada Residents

KLM does not sell covered information for monetary consideration as "sale" is defined under Nevada law. A qualifying Nevada consumer may submit a verified request concerning a potential future sale to privacy@closingtrak.com.

10. CHILDREN

The Services are business tools and are not directed to children under eighteen (18). We do not knowingly collect personal information directly from children for account, marketing, or advertising purposes. A customer may process information about a minor as Customer Data in connection with a transaction; the customer is responsible for determining the lawful basis and required notices or consents, and KLM processes that information only on the customer's behalf.

11. CHANGES TO THIS POLICY

We may update this Policy to reflect changes in law, technology, Services, vendors, or business practices. The "Last Updated" date identifies the current version. We will provide additional notice of material changes when required by law. We will not use previously collected personal information for a materially different, unrelated purpose without providing any notice or consent required by law.

12. CONTACT US

Questions, privacy requests, and appeals may be sent to privacy@closingtrak.com.

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