

Privacy Policy modified July 30, 2026

KLM Technologies, LLC and its affiliates (“ClosingTrak” or “we” or “us” or “our”) develop and support a technology platform and related services that help key actors in U.S. real estate, such as title and settlement agents, and title insurance underwriters, conduct their operations more efficiently and more transparently. Our platform supports these goals by enabling ClosingTrak’s customers to collaborate - collecting or sharing information with other ClosingTrak customers, service providers and individuals, such as buyers and sellers. In order to market and provide our services to customers, ClosingTrak collects and uses information too.

This Privacy Policy describes our privacy practices, including how and why we collect, use, and share personal information. This Privacy Policy applies to any ClosingTrak sites, apps or services developed and supported by ClosingTrak that link to or reference this Privacy Policy (the “Services”), such as closingtrak.com, and the ClosingTrak Go app for mobile devices. This Privacy Policy does not apply to ClosingTrak’s collection and use of personal information relevant to employees, whether prospective, current or separated. Also, this Privacy Policy does not apply to the practices of companies we don’t own or control or parties that we do not manage.

This Privacy Policy provides detailed information about the collection and use of personal information that ClosingTrak controls. It does not govern the collection and use of personal information that is controlled by others, such as ClosingTrak customers, including personal information that ClosingTrak may process for customers. For more information on the personal information that ClosingTrak processes for (and at the direction of) ClosingTrak customers, please see section 1.

By using or accessing the Services, you acknowledge that we will collect, use, and share your information as described in this Privacy Policy. Use of the Services is governed by terms and conditions. Use of ClosingTrak.com is subject to [Terms of Use](#). You have choices about whether to provide us with information and how we use that information. You may choose not to provide us with information, but your choice(s) may prevent you from using the Services or limit your use of certain features.

We may change this Privacy Policy to reflect changes in the law, our information practices or our operations. We will indicate the date of the most recent update at the top of this Privacy Policy. If we make a material change to the Policy, we will notify you as required by law. By using the Services, you confirm that you have read and understood the latest version of this Privacy Policy.

1. Personal Information ClosingTrak Processes For Customers

ClosingTrak customers use ClosingTrak to process personal information relevant to the people (e.g. buyer and seller) participating in a real estate transaction, such as a home purchase or refinancing (“Customer Data”). Customer Data may include: name, mailing address, property address, phone number, and email address.

ClosingTrak Customers control Customer Data. ClosingTrak processes Customer Data at the direction of ClosingTrak customers and subject to ClosingTrak's agreements with customers. Customer Data is not governed by sections 2-8 of this Privacy Policy.

If you were a participant (such as buyer or seller) in a transaction and have a question about how your information was processed, please contact the title agent that supported your transaction. If you are a customer and have questions about how ClosingTrak processes Customer Data, please review your agreement with ClosingTrak.

2. Information ClosingTrak Collects & Uses

A. Information You Provide

We collect information that you provide directly to us, such as name, email address, phone number, in a variety of ways. Some examples are when you:

- Use the Services, such as when you register for an account, log in to or use a service like ClosingTrak or the Closing Trak Go app, or when you visit our websites
- Request support or technical assistance
- Respond to surveys
- Subscribe to newsletters or request information like whitepapers
- Register for events, such as webinars or conferences
- Communicate with us in other ways

The information you provide directly to us may concern you or others. Some examples are:

- Contact information that helps us communicate with you or invite someone to a service, such as name, company & title, email address, mailing address, or phone number
- Information that helps ClosingTrak track priorities and joint plans, such as recordings of calls or videoconferences with prospects and customers, as well as transcripts
- Information that helps us secure accounts or enable integrations with other services, such as email address or phone number
- Information to support billing and payment as well as accounting, such as credit card or bank account information or tax IDs

B. Information Collected or Generated Automatically (Device & Usage Data)

When you use the Services, including when you visit our sites or install our apps, we automatically collect information about how you use the Services and the devices you use to access the Services. We may also generate information about you, such as identifiers for accounts or users. Some examples of the information we collect automatically or generate are:

- User ID
- Audio/Visual recordings with appropriate consent, such as of demonstrations or webinars or signing events. Recordings may be for our reference purposes or to satisfy regulatory requirements.
- Information about your user credentials, including for any third party service that you connect to or integrate with the Services, including tokens for your passwords or authorizations for other services
- Location information, such as precise device location or general location information from your computer or mobile device or your IP address
- Clickstream data, such as web log data, referring and exit pages and URLs, platform type, number of clicks, IP address, domain names, landing pages, including pages and content viewed and the order of those pages, the amount of time spent on particular pages, actions completed, transaction types, location of transactions, tasks and workflows, time spent completing tasks and workflows, the date and time of use of the Services, the frequency of use of the Services, other usage patterns, error logs, unique identifiers (including Ad IDs and Device IDs), device attributes, such as operating system and browser type. We may also collect on a real-time basis information on how you use and navigate the Services, including mouse movements, how you navigate within or scroll through the Services, and which parts of the Services you interact with.
- Cookies & Related Technologies - cookies and related technologies, such as web beacons or pixels, can help websites and services tailor sites to your preferences, track your use, including the pages you visit, manage content, compile statistics about usage of services, and learn about your online activity including on other sites or services. For more information about cookies, please review our Cookie Notice.
 - Users (e.g. individuals that log in to and use services like ClosingTrak or ClosingTrak Go) - We and our third party service providers, which include analytics providers like Amplitude, may use cookies and related technologies to collect a variety of information for analytics purposes. The information collected includes: information about the computers or devices (including mobile devices) you use when you log in to specific services and your activity within specific services, including, but not limited to, the clickstream data described above.
 - Visitors (e.g. individuals that visit our public sites and pages) - We and our third-party service providers, which include analytics providers, like Google Analytics, and ad networks, may use cookies and related technologies to collect a variety of information for analytics and advertising purposes. The information collected includes: information about the computers or devices (including mobile devices) you use to access our public sites and your activity on those sites, including, but not limited to, the clickstream data described above.

C. Other

Other Sources

We may gather information, including contact information, demographic, and statistical information, from third-parties, such as business partners, marketers, researchers, and analysts. We may use this information as described in Section 3, but typically we use this information to supplement the other information we collect. This can help us to improve our records, support administrative operations or market ClosingTrak and the Services.

Third-Party Services and APIs

The Services may allow customers to engage with services provided by others (third parties) in ways that affect personal information. For example, if you choose to register or log in using a third party account (such as Google or your Company's SSO provider), the authentication of your login details are handled by that third party and we collect the information you expressly agree to share with us at the time you give permission to link your account or deployment with the third party account. Collection and use of information by Third-Party Services and APIs is subject to the policies of the applicable third parties or our customers' agreements with them.

3. How ClosingTrak Uses Your Information

A. Primary Uses

In general we use personal information to develop, provide, support, and secure the Services or to market and communicate about the Services and ClosingTrak. Some specific examples of how we use personal information are:

- Prevent, detect, investigate and respond to fraud, unauthorized access/use of the Services, breaches of terms and policies, or other wrongful behavior
- Create and administer accounts and otherwise provide the Services
- Troubleshoot problems and support customers
- Bill for use of the Services and collect payments
- Analyze use of the Services and other operations, such as to determine which portions of the Services are used most frequently, for audit and support purposes, to support our advertising, including to evaluate the success of our advertising campaigns
- Develop and test new features and services, including by conducting surveys
- Manage the Services and our platform, including support systems and security
- Market the Services, ClosingTrak, and new services, or to pursue leads, host events and provide networking opportunities
- Develop and deliver targeted online ads to people that visit ClosingTrak sites

- Communicate with you about ClosingTrak, the Services and our relationship
- Protect or defend our legal rights
- Comply with any procedures, laws, and regulations which apply to us, including those that set retention periods
- In other lawful ways if we have your consent

B. Other Uses - Deidentified Information

We may take steps to limit or prevent identification of any particular individual or device in the information we collect, such as by combining information relating to many individuals ("aggregation") or removing or changing pieces of information about each individual. We may use de-identified information for any lawful purpose, including to support our research, development, and marketing efforts.

4. To Whom ClosingTrak Discloses Your Information

We may disclose information about you to the types of recipients described below.

- **Service Providers** - Like many technology companies, we rely on other companies that support the services we provide to our customers and help us to conduct certain business operations. In many cases, these service providers need to process personal information in order to provide the relevant services. Some examples are: data storage, payment processing, analytics and two-factor authentication using SMS. We may also share information with our advisers, such as lawyers, auditors, and insurers to the extent necessary to receive advice.
- **Affiliates** - We may share your personal information with other companies that are under common control or ownership with KLM Technologies. These Affiliates may use your information as described in this Privacy Policy.
- **Marketing Partners & Event Attendees** - We may share basic contact and professional information with sponsors of events, webinars, or sweepstakes for which you register, or other parties with whom we may engage in joint marketing activities. If you register for a ClosingTrak sponsored event, ClosingTrak may make the attendees list available to other attendees.
- **Other Users** - When users are logged in to certain services, the actions or conduct of the user are logged and portions of that activity may be available to the customer that pays for the applicable Services or who acts as an administrator. As discussed in our documentation, the Services enable customers (and their users) to engage with other customers, service providers and individuals, such as buyers and sellers, to collect and share information.
- **Business Changes/Transfers** - Your personal information may be disclosed or transferred to relevant third parties in the event of, or as part of the due diligence for, any proposed or actual reorganization, sale, merger, consolidation, joint venture, assignment, transfer, or other disposition of all or part of our business, assets, or stock (including in connection with any

bankruptcy or similar proceeding). Disclosures of information in due diligence will typically be of aggregated information. If a corporate transaction occurs, we will provide notification of any changes to the control of your information, as well as choices you may have.

- **Law enforcement agencies, regulatory or governmental bodies, or other third parties** - We may share your information in order to respond to legal process, comply with any legal obligation; protect or defend our rights, interests or property or that of third parties; or prevent or investigate wrongdoing in connection with the Services.
- **Consent** - We may share certain information in other ways if you have asked us to do so or have given your consent. For example, we may publish a testimonial from you, if you provided your consent.

5. Security

We employ organizational and technical measures that are intended to safeguard the personal information we collect, use or store. We also provide account administrators and individual users with features that can be used to enhance security. However, no method for transmission or storage of information is 100% secure. We cannot guarantee complete privacy or security for the information that you provide or that we collect.

6. Choices

- Many of our services offer account pages or administration panels that allow individuals to review and adjust the information associated with their account. Please review the applicable documentation, such as knowledge base articles, or contact customer support if you need assistance with managing user or account information.
- **Marketing Communications** - To opt out of marketing emails from ClosingTrak, follow the unsubscribe links in emails. Please note that you will continue to receive transaction-related emails regarding services you use or request, and you will not be able to opt out of those communications (e.g., communications regarding the Services, your Account, or updates to our Terms or this Privacy Policy).
- **Analytics, Ads and other Uses of Cookies** - [See our Cookie Notice](#) for more information on cookies in general, which cookies we use and your choices about them. You can also navigate to our consent manager to get additional information on cookies and exercise choices.

7. State Specific Notices

A. Individual Rights.

Several states, including California, Colorado, Connecticut, Utah, Virginia and Washington have enacted comprehensive privacy laws for consumers and their personal information. Subject to certain exceptions, these laws typically establish rights for consumers regarding their personal information, including: the right to know if their personal information is being processed; the right to access their personal information; the right to correct their personal information; the right to delete their personal information; the right to opt out of sales of their personal information; the right to opt of targeted advertising.

ClosingTrak does not market to consumers. As described in Section 1 ClosingTrak customers (professionals in the real estate sector) may use ClosingTrak to process personal information relevant to the participants (such as buyers and sellers) to real estate transactions, who may be consumers. This means that some or all of the personal information that is processed by ClosingTrak may be controlled by a ClosingTrak customer. Additionally, that information may be subject to laws, such as the Gramm-Leach-Bliley Act (GLBA), that affect whether state privacy law applies as well as a consumer's rights under the applicable law.

If you are a resident of a state that has a comprehensive consumer privacy law in effect and have engaged with ClosingTrak for personal or household reasons, we recommend that before you submit a rights request you closely review this Privacy Policy because it describes the personal information we collect and the purposes for which we use it as well as with whom we might share the information.

Rights requests may be submitted to privacy@closingtrak.com. Residents of several states, including Colorado, Connecticut and Virginia may appeal a refusal to fulfill a rights request by emailing privacy@closingtrak.com.

You may have the right to opt out of "targeted advertising" as that term is defined in applicable law. We may use certain information collected when individuals visit our public sites, such as closingtrak.com, so that we can target and deliver relevant advertising about ClosingTrak and ClosingTrak services. As part of our targeted advertising, we may disclose identifiers (like IP addresses and email addresses), internet or other electronic network activity information (like information regarding an individual's browsing interactions on our public sites), and commercial information (like the fact that a browser visited a page directed to people who are considering title production software) with advertising platforms and advertising networks. To opt out of targeted advertising, please visit this link:

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B. California Shine the Light

If you are a consumer that resides in California and if applicable, you have a right to ask for a list of third-parties that have received your information for their own direct marketing purposes during the previous calendar year. We do not share personal information of California consumers with third parties for their own direct marketing purposes.

C. California Do Not Track.

We do not currently take steps to respond to browsers' "Do Not Track" signals as no uniform standard to respond to such signals has been developed at this time. Please note that Do Not Track is a different privacy mechanism than the Global Privacy Control browser choice described below.

D. Supplemental Privacy Notice for California Residents

This section supplements the information contained in the ClosingTrak Privacy Policy and applies solely to visitors, users and others who are residents of the State of California, as defined in Section 17014 of Title 18 of the California Code of Regulations.

I. Information We Collect and Purposes For Which It Is Used

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("CA Personal Information"). The table below describes information that may be collected or shared. These collections and any sharing do not occur in every case. This section does not describe collection and use of information that ClosingTrak processes only on behalf of ClosingTrak customers or that is exempt from California's Consumer Privacy Act (CCPA). CCPA exempts certain data from the definition of personal information, including publicly available data and personal information covered by certain sector-specific privacy laws, such as personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (Public Law 106-102), and implementing regulations, or the California Financial Information Privacy Act (Division 1.4 (commencing with Section 4050) of the Financial Code).

Categories of Personal Information defined by CCPA	Collect	Details	Source	Typical Uses (Purposes) - For more info see section 3 (How Does ClosingTrak Use Your Information)
Identifiers	Yes	Name, email address, postal address, telephone #, account #, user ID, IP address, cookies	Individual, third party, or generated by ClosingTrak	• Create accounts • Provide the services • Analyze use of the service • Secure the Services • Communicate with users and prospects
Personal Information described in subdivision (e) of Section 1798.80	Yes	Name, signature, address, phone #, bank account #, credit card #	Individual or third party	• Create accounts • Provide the services • Secure the Services • Collect and issue payments

Categories of Personal Information defined by CCPA	Collect	Details	Source	Typical Uses (Purposes) - For more info see section 3 (How Does ClosingTrak Use Your Information)
Protected classifications	No	N/A	N/A	N/A
Commercial Info	Yes	Order Forms, Invoices	Generated by ClosingTrak or issued by payment processors	• Collect and issue payments • Document Customer orders
Biometric Info	No	N/A	N/A	
Internet activity	Yes	Browsing history, log files	Individual, Generated by ClosingTrak	• Analyze use of the Services • Develop and improve the Services • Secure the Services • Market the Services
Geolocation Data	Yes	General location associated with IP address	Individual or Individual's device	
Audio, electronic visual or similar info	Yes	Voices and images	Prospects, Customers, Users with appropriate consent	• Provide the Services • Customer support • Research and development
Professional or employment info	N/A	N/A	N/A	N/A
Education info	Yes	As part of individual's professional background	Individual User, Third parties, public sources	• Market the Services

Categories of Personal Information defined by CCPA	Collect	Details	Source	Typical Uses (Purposes) - For more info see section 3 (How Does ClosingTrak Use Your Information)
Inferences drawn from personal information	No	N/A	N/A	N/A
Sensitive Personal Information	Yes	Access credentials	Individuals	- Secure the Services - Support connections with other services (as requested by users)

II. Disclosures for Business Purposes, Categories of Recipients to Whom CA Personal Information is Disclosed for a Business Purpose

Any CA Personal Information we collect is subject to disclosure to our service providers. These service providers help ClosingTrak achieve its purposes as described above in Section 2, and Section 7(D)(I) - whether that is merely storing the data or helping us send an email to individuals or to process payments. In more specific cases, certain CA Personal Information may be disclosed to others, including other users. For example, we may: disclose basic contact info about event attendees to co-sponsors and other attendees.

III. Retention of CA Personal Information

ClosingTrak retains or stores CA Personal Information for as long as necessary to: achieve the purpose for which it is processed; comply with retention periods established by applicable law; prevent or resolve disputes; or enforce our agreements.

IV. Individual Rights

If you are a California resident, you generally have certain rights in relation to your CA Personal Information. California law may permit you to request that we:

- Provide you the categories of CA Personal Information we have collected or disclosed about you; the categories of sources of such information; the business or commercial purpose for collecting, selling, or sharing your personal information; and the categories of third parties with whom we “share” CA Personal Information (as defined under CA law and if applicable) or to whom we “sell” CA Personal Information (as defined under CA law and if applicable).
- Stop selling your CA personal Information (if applicable)
- Stop sharing your CA Personal Information (if applicable)
- Provide access to or a copy of certain California Personal Information we process
- Correct inaccurate CA Personal Information that we process

- Delete certain CA Personal Information we process

You may also have the right to receive information about the financial incentives that we offer to you (if any). You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. Finally, the CCPA also allows you to limit the use or disclosure of your “sensitive personal information” (as defined in the CCPA) if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information other than for purposes for which you cannot opt out under the CCPA.

V. Exercising Your Rights

We recommend that before you submit a rights request you closely review this Privacy Policy because it describes the CA Personal Information we collect and the purposes for which we use it as well as with whom we might share the information. If you are a user, we also recommend that you take advantage of the account management tools we provide within the applicable services (e.g. ClosingTrak, ClosingTrak Go, etc.).

Before satisfying a rights request ClosingTrak will take steps to verify the identity of the requestor. These steps may include: requiring you to log in to your account (if applicable); confirming your possession or knowledge of certain information about our relationship with you; asking you to complete a declaration regarding your identity. If your request is submitted by an agent, ClosingTrak will take steps to verify your identity as well as the authority of the agent, including whether the agent is registered with the California Secretary of State. If we cannot verify the identity of a requester or the authority of an individual’s agent (if applicable), we will not satisfy the request. Please also take a few minutes to write and present requests that are descriptive and clear about exactly what you want.

Exceptions to Rights Requests. CCPA sets out a number of grounds on which a business may deny a rights request. For example a request to delete may be denied if the CA Personal Information is needed 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 relations 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. If there are reasonable grounds for denying a rights request, we will advise you of that fact.

If you have a rights request, please contact privacy@closingtrak.com.

VI. Sharing

The CCPA also requires businesses that “share” CA personal information to provide an opt out from such sharing. Under the CCPA, “sharing” is defined as the targeting of advertising to a consumer based on that consumer’s personal information obtained from the consumer’s activity across websites. We may “share” information collected when individuals visit our public sites, such as closingtrak.com so that we can target and deliver relevant advertising about ClosingTrak and ClosingTrak services. As part of our targeted advertising, we may “share” identifiers (like IP addresses and email addresses), internet or other electronic network activity information (like information regarding an individual’s browsing interactions on our public sites), and commercial information (like the fact that a browser visited a page directed to

people who are considering title production software) with advertising platforms and advertising networks. To opt out of such “sharing,” please visit this link:

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VII. Sales

The CCPA also requires businesses that "sell" CA personal information to provide an opt out from such sharing. Based on the definition of “sell” under the CCPA, we do not believe we engage in such activity.

E. Notice for Nevada Residents

Under Nevada law, certain Nevada consumers may opt out of the sale of "personally identifiable information" for monetary consideration. "Personally identifiable information" 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.

We do not engage in such activity; however, if you are a Nevada resident who has purchased or leased goods or services from us, you may submit a request to opt out of any potential future sales under Nevada law by emailing privacy@closingtrak.com. Please note we will take reasonable steps to verify your identity and the authenticity of the request. Once verified, we will maintain your request in the event our practices change.

F. NOTICE FOR COLORADO RESIDENTS

For disclosures required by the Colorado Privacy Act regarding categories of personal information we process, processing purposes, and disclosures, please see the Sections 7.D.I and 7.D.II above.

8. Questions & Contact Information

If you have any questions or concerns regarding this Privacy Policy or ClosingTrak’s use of your information, please send a detailed message to privacy@closingtrak.com. ClosingTrak is headquartered in Fort Wayne, IN at 3601 Hobson Road, Suite 202, Fort Wayne, IN 46815.