

Altisource U.S. Consumer Privacy Notice

Facts	WHAT DOES ALTISOURCE DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and credit information • Demographic information, employment information and information about your transactions with us, our affiliates or others • Account details, transaction and payment history
How?	All financial companies need to share such customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Altisource chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Altisource share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our Affiliates' everyday business purposes — information about your transactions, experiences (excluding information about your creditworthiness)	Yes	No
For our Affiliates' everyday business purposes — information about your creditworthiness	Yes	Yes
For our Affiliates to market to you	Yes	Yes
For non-Affiliates to market to you	No	We don't share

To limit our sharing	<p>Please send us an email to OptOutRequest@Altisource.com, with your name and address, specifying any of the following options:</p> <ul style="list-style-type: none"> ○ <i>Do not share information about my creditworthiness with your Affiliates for their everyday business purposes.</i> ○ <i>Do not allow your Affiliates to use my personal information to market to me.</i> ○ <i>Do not share my personal information with non-Affiliates to market their products and services to me (we don't do this).</i> <p>Please note that we will only take action in response to emails specifically identifying exactly one or more of the above options.</p> <p>Note: If you are no longer our customer, we may continue to use and/or share your information as described in this notice. However, you can contact us at any time to limit our sharing as described above.</p>
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Who we are

Who is providing this notice?	Altisource Solutions S.à r.l. ("Altisource")
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What we do

How does Altisource protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Altisource collect my personal information?	<p>We collect your personal information when you access our websites, for example, when you:</p> <ul style="list-style-type: none"> • Register on any of our websites • Update any account information • Use our websites (including when you add information on a web form or when you otherwise correspond with us regarding our products and services) • Acquire services and products through our websites <p>We may also collect your personal information from others, such as credit bureaus, Affiliates, third parties and public sources.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for Affiliates' everyday business purposes — information about your creditworthiness • Affiliates from using your information to market to you (on their own behalf) • Sharing for non-Affiliates to market to you <p>State laws and individual companies may give you more rights to limit sharing. See the section below titled "Other important information" for additional rules that may apply under state law.</p>

Definitions

Affiliates	Companies controlling Altisource, and companies related by common ownership or control. They can be financial and nonfinancial companies.
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	Our Affiliates include companies such as Altisource Business Solutions, Inc., Altisource Business Solutions Private Limited, Altisource Fulfillment Operations, Inc., Altisource Fulfillment Operations, Inc. d/b/a Owners.com Loans, Altisource Holdings, LLC, Altisource Holdings S.à r.l., Altisource Online Auction, Inc., Altisource Outsourcing Solutions S.R.L., Altisource Portfolio Solutions, Inc., Altisource Solutions, Inc., Altisource Portfolio Solutions S.A., Association of Certified Mortgage Originators Risk Retention Group, Inc., Association of Certified Originators, CastleLine Re, Inc., CastleLine Risk and Insurance Services, LLC, GoldenGator, LLC, Hubzu USA, Inc., Nationwide Credit, Inc., Premium Title Services, Inc., Premium Title of California, Inc., Premium Title Agency, Inc., PTS- Texas Inc., REALHome Services and Solutions, Inc., REIsmart, LLC, Springhouse, LLC, The Mortgage Partnership of America, LLC, Western Progressive – Arizona, Inc., Western Progressive – Nevada, Inc., Western Progressive Trustee, LLC, Western Progressive – Washington, Inc.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	An agreement between non-affiliated financial companies that together market financial products or services to you.

Other important information	
	For Nevada residents only: We are providing you this notice under state law. You may be placed on our internal Do Not Call List by calling the telephone number listed in the Choice/Opt-Out Section of the Online Privacy Policy below. Nevada law requires we provide the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number- 702.486.3132; email: BCPINFO@ag.state.nv.us.
	Vermont: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of our corporate family, unless the law allows. For example, we may share information with your consent to service your accounts or with other financial institutions with which we have joint marketing agreements. We will not share information about your creditworthiness within our corporate family except with your consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.
	California: Under California law, we will not share information we collect about you with companies outside of Altisource, unless the law allows. For example, we may share information with your consent, to service your accounts or to provide rewards or benefits to which you are entitled. We will limit sharing among our companies to the extent required by California law.

Online Privacy Policy

This Online Privacy Policy (“Policy”) applies only to natural persons who browse or view the Sites (as defined below).

This Policy describes how Altisource Solutions S.à r.l. and its Affiliates and subsidiaries (collectively “Altisource”, “us”, “our” or “we”) collect, share, use and protect certain personal information from or about you through any online interface (e.g., website or mobile application) owned and controlled by us that links to or references this Policy (each a “Site”). We will use and share any information that we collect from or about you in accordance with this Policy and the Altisource U.S. Consumer Privacy Notice (“Notice”)

above, which provides certain choices in the use and sharing of information. Please note, however, that this Policy is not an exclusive statement of our privacy principles across all our portfolio of products and services. Other privacy principles or policies may apply depending on the products or services you obtain from us, please review carefully all the notices and policies included in each website you access. Your use of the Sites constitutes your agreement to the terms and conditions of this Policy and any other policies linked to or referenced in such Sites. This Policy hereby incorporates the defined terms set forth in the Notice. In the event that we receive any information pertaining to You through any third party with whom we have a separate agreement, our rights to use such information will be governed by such separate agreement rather than this Policy.

INFORMATION WE COLLECT ONLINE

Personally Identifiable Information (“PII”) PII is information that can be used (either alone or in combination with other information) to identify, contact or locate a unique person. This includes a person’s first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to the person:

- Social Security Number
- Date of birth
- Place of birth
- Mother’s maiden name
- Payment card information
- Financial account numbers, with or without any required security code, access code, personal identification number or password, that would permit access to a person’s financial account
- Income tax records
- Driver’s license numbers or state-issued identification numbers
- Address information, such as home address or email address
- Telephone number
- Financial information

We may obtain PII about you directly from you, through your use of our Sites, products and services and from third parties and public sources.

If you create an account, and provided that your account is not disabled, you may log in to review or change certain PII you provided when you registered. However, you may not request changes to the transaction history related to your activities conducted on this or other Sites or on third-party websites.

We also use cookies (pieces of information stored directly on the device you are using), pixel tags, and similar technologies to provide enhanced functionality on the Sites (e.g., user ID and password prompts), aggregate traffic data (e.g., what sites are the most popular) and collect information about you. We collect information about the site you came from, the parts of our online service you access, and the site you visit next. You can refuse to accept cookies, and most devices and browsers offer their own privacy settings for cookies. You will need to manage your cookie settings for each device and browser you use. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Sites (including the inability to visit certain pages or use certain features on the Sites). Some devices and browsers permit you to broadcast a preference that you not be “tracked” online, at this time we do not modify your experience based upon whether such a signal is broadcast. Currently, our systems do not recognize browser “do-not-track” requests.

We may also collect information about you from additional online and offline sources including commercially available third-party sources. We may combine this information with the PII and other information we have collected about you under this Policy.

In addition and notwithstanding anything in this Policy, Altisource will have the right to collect aggregated

or de-identified data (e.g., data that does not identify an entity or natural person as the source thereof) resulting from your use of the Sites. To the extent that any aggregated or de-identified data is collected by us, we may use such data for any lawful purpose, provided that the data is used only in its aggregated or de-identified form.

Payment Card Information

We may accept payment card information to provide our customers with the convenience of purchasing our products and services online. Payment card information is defined as a credit card number (also referred to as a primary account number or PAN) in combination with one or more of the following data elements:

- Cardholder name
- Service code
- Expiration date
- CVC2, CVV2 or CID value
- PIN or PIN block

Any payment card information that we collect is protected by Secure Sockets Layer encryption technology. Once submitted, we store only the information required to reference your original transaction (which cannot be used to process another charge transaction). We do not store your payment card information on file.

HOW WE USE THE INFORMATION COLLECTED ONLINE

We may use the PII and other information we collect to:

- Verify your identity
- Process, evaluate and respond to your requests, inquiries and applications
- Protect against and prevent fraud, unauthorized activity, claims and other liabilities
- Send you important information regarding the Sites, changes to our terms, conditions, and policies and/or other administrative information
- Allow you to participate in surveys, sweepstakes, contests and similar promotions and to administer these activities (some of these activities may have additional rules, which could contain additional information about how we use and disclose your information)
- Control risk, and comply with laws, regulations and other legal process and law enforcement requirements
- Operate, evaluate and improve our business (including developing new products and services, improving existing products and services, performing data analytics and accounting, auditing and other internal functions)
- Engage in marketing activities (e.g. to deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you) and communicate with you about our products, services, and events
- Measure the effectiveness of our communications or the success of our marketing campaigns
- Ensure that the Sites function properly, diagnose server problems, administer the Sites, facilitate navigation, display information more effectively, and personalize your experience on the Sites
- Understand how people use the Sites, calculate Site usage levels, and compile statistics about usage and response rates
- Comply with and enforce legal requirements, industry standards, contractual obligations and our policies

We also may use the PII and other information in other ways consistent with the Notice or for which we provide specific notice at the time of collection, or for other legally permissible purposes related to our business.

ADDITIONAL INFORMATION

Additional Sharing

We may share your information with vendors that provide services to us, including companies that provide web analytics, data processing, data scrubbing, advertising, e-mail distribution, payment processing, order fulfillment, and other services.

In addition to the sharing described in this Policy, we may share information as otherwise described to you at the point of collection or pursuant to your consent.

Transfer of Information

We may share information, including PII, with third parties (such as buyers, assignees or other successors) in the event we sell or transfer all or a portion of our business or assets (such as in connection with a merger, acquisition, reorganization, debt financing, insolvency, bankruptcy, dissolution, sale, change of control, or liquidation), or take steps in anticipation of such transactions.

Law Enforcement, Disputes and Safety

We may share information, including PII, in connection with any lawsuit or proceeding, or in response to legally valid requests or demands from courts, law enforcement and other government agencies. Furthermore, we may disclose your information, including your PII, if we have a good faith belief disclosure of such information is reasonably necessary to satisfy any applicable law, regulation or self-regulation. We may also disclose your information to prevent fraud, for risk management purposes, or protect the safety of other users.

Links and Social Media

The Sites may contain links to non-Altisource websites. Please be aware that we are not responsible for the content or privacy practices of those websites, you should review their privacy and security policies and other terms and conditions, as they may be different from those of our Sites. Altisource may provide experiences on social media platforms that enable sharing and collaboration among users who have registered to use them. Your use of such platforms and the content you post on Altisource's managed social media pages is subject to the Terms of Use and Privacy Policies of those respective platforms. In addition, please note that when visiting and/or using such Altisource managed social media sites, you are also subject to Altisource's policies.

Consent to Transfer Information

If you are accessing the Sites from outside of the United States, please be aware that any information that we collect may be transferred to, processed and stored in the United States. If you are accessing the Sites from the United States, please be aware that any information that we collect may be transferred to, processed and stored outside of your state or outside of the United States. Your use of the Sites constitutes your agreement to this transfer, processing and storage of your information.

Children

Altisource does not knowingly collect information from children. Our products and services are not directed to or intended for children under the age of 13.

Choice/Opt-Out

From time to time, we may send you communications, including e-mails, e-mail newsletters or Site news updates. If you no longer wish to receive these materials from us you may opt-out of receiving them; provided, however, that we may be required to continue to send certain legally-required or product-update notices. This opt-out will not apply to transaction-related communications.

Opt-Out Procedure: In compliance with the Can-Spam Act of 2003, each marketing email transmitted by the Sites has instructions for opting out of receiving future emails. If you wish to opt-out of receiving marketing emails or phone calls from Altisource please send us an email to: OptOutRequest@Altisource.com; or call us at 1-855-373-7205.

UPDATES TO THIS POLICY AND THE NOTICE

We may change this Policy and/or the Notice from time to time. Please review these documents periodically. Any change to this Policy or the Notice will become effective when posted. Your use of this Site following such revisions constitutes your agreement to the revised Policy or Notice.