INTRODUCTION

Altisource S.à r.l. (“Altisource”, “we” or “us”) is a leader in providing services and technology for the mortgage and real estate industries. As part of our operations and in the provision of our products and services and information about those products or services, we use, control and operate, directly or indirectly, several websites and applications (collectively, the “Sites”).

Your privacy is important to us. This Privacy Statement describes how Altisource and its affiliates collect, use and disclose the personal data we receive or that you provide or make available to us in connection with the Sites that link to this Privacy Statement. This Privacy Statement also sets forth the steps users or visitors of the Sites (“you”) can take to access this information and to request its correction or deletion to the extent required by applicable law. Additionally, this Privacy Statement contains an explanation of the information we collect from or about you in the context of your application for employment or engagement with us as an independent contractor, some of which information may be submitted by you to us without use of the Sites.

This Privacy Statement is intended to be comprehensive but may not be the exclusive statement of our privacy principles across all our portfolio of online products and services or your rights with respect to certain personal data. Other privacy principles or policies may apply depending on the products or services you obtain from us. Those privacy principles or policies, if any, will be set forth on the relevant Site, typically in the online terms and conditions. Please carefully review all the notices and terms included on each Site you access.

“Personal data” as used in this Privacy Statement means information that can be associated with a specific person and could be used to identify a specific person. Examples of personal data include your name, contact details, credit card information, job applications, information you provide when you create an account or a personal profile on one of our Sites and, in some cases, information about the pages you have viewed and the path you have taken through our Sites to the extent such information can be associated with you.

If you are a California resident, please see the additional information below regarding rights you may have under California law.

COLLECTION AND USE OF YOUR PERSONAL DATA

Personal data you provide to us

We may collect personal data from you when you seek services or products from us. Such collection often occurs through your use of, or interaction with, one or more of the Sites. When you express interest in, or purchase, license or use our products or services, for example by completing an online user registration form on a Site or calling one of our customer care centers, we may collect your name, email address, phone number, company information and other information we may deem necessary to provide the services and products. Some of our lines of business may collect additional categories of information from you depending on the product or service you purchase, license or use, including your social security number, your driver’s license number, your passport number or other similar identifiers. We may use this information: (i) to provide services and products, (ii) to facilitate any transaction contemplated by the services or products you purchase, license or use, (iii) to provide you with access to the service or product, (iv) to provide customer support, (v) to provide you with a personalized experience when you use our Sites, (vi) to contact you or your designated contacts about the services or products purchase, license or use, (vii) to analyze your interaction with our products and services, (viii) to improve our Sites, products and
services, (ix) for security, credit or fraud prevention purposes, (x) to invite you to participate in surveys and provide feedback to us, (xi) to better understand your needs and interests, (xii) to display personalized advertising when you visit our Sites or other unrelated websites, (xiii) to improve our marketing and promotional efforts, (xiv) for any other purpose identified in a Site’s terms and conditions, or (xv) otherwise as necessary for complying with applicable laws and regulations. We may also use this information to email you about other Altisource services and products that we deem may be of interest to; you may unsubscribe from these communications by clicking on the unsubscribe link provided in the email.

We also may use the information described above as otherwise described to you at the point of collection or pursuant to your consent. We may process your personal data with your consent (which may be collected through our Sites) or, without your consent, where (a) processing is necessary for the performance of a contract with you or pre-contractual measures at your request; (b) processing is necessary for compliance with a legal obligation to which Altisource is subject; (c) processing is necessary in order to protect your vital interests or those of another natural person; or (d) processing is necessary for Altisource’s legitimate interests (such as, managing, improving or promoting services and products).

If you apply for a job at Altisource or its affiliates or express interest in joining our vendor network, in either case whether online through the Sites, through third party websites or offline at events where Altisource is present, we may collect your name, email address, phone number and other personal data. We may use this information to contact you about your request or application, to verify information you provided in your application, and in the event of employment with Altisource, for the administration of benefits and maintaining an emergency contact in our files. We may also use this information to email you other news and alerts we determine may be of interest to you. You may unsubscribe from these communications by clicking on the unsubscribe link provided in the email.

Finally, we also may use the information described above in any other manner as described to you at the point of collection or pursuant to your consent.

**Personal data received from third parties**

Altisource may receive personal data and other information about you from third parties. This information may be used to support our marketing and sales efforts. We may use this information to contact you and to determine your, or your company’s, interest in our products and services. You may unsubscribe from these communications by clicking on the unsubscribe link provided in the email.

We also act as a service provider to other institutions including servicers, banks, loan originators and government-sponsored entities. In some cases, we may receive personal data and other information about you in our capacity as a service provider. In addition to the uses of your personal data as described above, we may use your personal data on an individual or aggregated basis to provide our products or services to those institutions or to provide such institutions with reporting on our performance.

In addition, we also may use the information described above for other legally permissible purposes related to our business.

**Personal data collected via cookies and other technologies**

The Sites may include cookies, pixel tags, web beacons, and other technologies. These technologies help us to provide, improve and protect the Sites, such as by personalizing content, tailoring and measuring advertising campaigns, and providing a safer experience. We may use these technologies to recognize you as a visitor, verify your account and determine when you’re logged in, store your preferences and settings,
customize content and advertising, mitigate risks and prevent fraud, measure promotional and advertising effectiveness, assess and analyze which areas of the Sites you visit and use, and gather statistics on the number of visitors and their usage patterns. We may also use these technologies to display Altisource advertisements when you visit third party websites with which we have marketing relationships.

Cookies or other technologies may be placed on our Sites by third party service providers who perform some of these functions for us.

Your web browser may allow you to block certain cookies and technologies, or to indicate when a cookie is being set by a website. Consult the help or support section of your web browser to learn more about your options. Please note that if you disable or block cookies or other technologies, our Sites may not function properly. Some web browsers have a “Do Not Track” feature. This feature lets you inform websites you visit that you do not want to have your online activity tracked. These features are not yet uniform across browsers. The Sites are not currently configured to respond to those signals.

We may also automatically gather server log file information, including your Internet Protocol address, browser type, referring/exit pages and operating system. In addition to the other uses described in this Privacy Statement, we may use this information to administer the Sites, keep track of online transactions, understand how our visitors use the Sites, and enhance your experience while using the Sites.

Combination

We may combine the foregoing information, and we may also combine any of the foregoing information with other information we obtain or collect about you and with any information or inferences about your interaction with the Services, ads, content, webpages or applications.

DISCLOSURES AND TRANSFERS

General

We may provide anonymized aggregated statistics about our customers and visitors (including you) to the public, third parties or customers.

Disclosure to affiliates

We may share any of the information described in this Privacy Statement (including the personal data you submit, the data collected by us when you purchase our services, the information we receive from third parties, and the information gathered through cookies or other technologies), with our affiliates to provide our services and products and to help us to communicate with you.

Disclosure to our institutional customers and service providers

We may share any of the information described in this Privacy Statement (including the personal data you submit, the data collected by us when you purchase our services, the information we receive from third parties, and the information gathered through cookies or other technologies), with institutional customers with whom we have a contractual relationship to provide certain products or services. Additionally, in some cases, we engage third party service providers to help us provide our products or services to those institutional customers and to other interested parties (including you). In connection with our engagement of those service providers, we may share your personal data with them so they can provide services to you, us or our institutional customers. These service providers are authorized to use your personal data and other information only as necessary to provide these services to us and we use commercially reasonable
efforts to limit disclosure of your personal data to such service providers, including by aggregating or removing personal identifiers from such personal data where possible.

We may also share any of the information described in this Privacy Statement (including the personal data you submit, the data collected by us when you purchase our services, the information we receive from third parties, and the information gathered through cookies or other technologies), with other service providers who provide services to us or help us with our business activities, such as by providing website analytics, payment processing, order fulfillment, e-mail distribution, data scrubbing, data processing, customer service, marketing and other services. These service providers are authorized to use your personal data and other information only as necessary to provide these services to us and we use commercially reasonable efforts to limit disclosure of your personal data to such service providers, aggregating or removing personal identifiers from such personal information where possible.

Disclosure to legal authorities

We may share any of the information described in this Privacy Statement (including the personal data you submit, the data collected by us when you purchase our services, the information we receive from third parties, and the information gathered through cookies or other technologies), in connection with any lawsuit or proceeding, or in response to legally valid requests or demands from courts, law enforcement, regulators and other government agencies. Furthermore, we may disclose any of the aforementioned information, if we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, or investigate fraudulent activities.

Disclosures due to merger, acquisition or other transactions

We may share any of the information described in this Privacy Statement (including the personal data you submit, the data collected by us when you purchase our services, the information we receive from third parties, and the information gathered through cookies or other technologies), with third parties (such as buyers, assignees or other successors) in relation with a planned or actual merger, acquisition, or any form of sale of some or all of Altisource’s assets.

Transfers

We may store and process your personal data and other information in data centers around the world, wherever Altisource’s facilities or service providers are located, including in the United States and other countries that may not provide the same level of protection as those where you first provided the information. Such transfers will be secured in compliance with applicable legal requirements.

OTHER INFORMATION

Links and social media

The Sites may contain links to other websites. If you submit personal data or other information to any of those websites, your information is subject to their privacy notices. We encourage you to review the policies, rules, terms, and regulations of each website that you visit. Altisource may provide experiences on social media platforms that enable sharing and collaboration among users. Your use of such platforms and the content you post on Altisource’s managed social media pages is subject to the policies, rules, terms, and regulations of such platforms.
Retention and Security

Altisource may retain personal data and other information as long as it is needed to provide products and services that you or your organization have purchased, to communicate with you about requests you have made, to manage your choices and rights you have exercised pursuant to this Privacy Statement, to comply with our legal and regulatory obligations, to demonstrate compliance, and to enforce Altisource’s rights and agreements.

We endeavor to take appropriate security measures to protect personal data against loss, misuse and unauthorized access, alteration, disclosure, or destruction. Although we take commercially reasonable measures to protect the confidentiality, integrity and security of your personal information, we cannot guarantee the security of your personal information. For this reason, we urge users to take every precaution to protect their personal information. In addition, we train our employees about the importance of information privacy and security.

Information about Children

Altisource does not knowingly collect information from children. We do not offer services to children and we ask that minors do not submit any personal data to us or use the services offered through our Sites.

Information for California Residents

This Privacy Statement contains a list of the categories of personal data we collect and have collected about consumers in the preceding twelve months. Please take note that we do not sell the personal data we collect.

If you are a natural person who is a resident of California, then under California law, you or your authorized agent have the right to ask us to disclose the personal data we collect, use and disclose about you. You also have the right to ask us to delete certain personal data collected or maintained by us about you. Please note that there may be certain reasons under California law why we may not be able or required to honor your request (e.g., we are legally required to retain your personal data and therefore cannot delete it), but we will inform you of any such reasons in response to your request.

To submit a request to access or delete your data, please [click here] or call toll free (855) 373-7205. If you are an agent submitting a request on behalf of a California resident, please be sure you are able to provide us with evidence of your authority to make such a request within ten (10) days of making such request. Acceptable evidence of authority includes provision of either a duly authorized power of attorney or a written statement of authorization from the consumer. If you submit the latter to us as evidence, please be aware that the consumer will be required to verify their own identity directly with us. If you are a consumer making a request, please be aware that in order to protect from the inadvertent disclosure of your personal data to an unauthorized party, you will be required to verify your identity with us following submission of your request. If you have a password-protected account with us through one of our Sites, we will notify you of steps you will need to take to verify your identity through that account. If you do not have a password-protected account with us through one of our Sites, we will ask you to verify your identity by providing two to three data points which we will match against our records.

When you make a request, whether through the online webform available at the link above or through the toll free number, please have the following information ready:

- Whether you are a consumer or an agent submitting a request on behalf of a consumer
- Consumer’s first and last name
- Your email
- Your phone number (optional)
- Whether you are submitting a request about a household rather than an individual
- If you are submitting a household request, you will be required to provide an identifier for the household (e.g., physical address, IP address or landline phone number)
- One or more of the Altisource businesses that are included as part of your request:
  - Altisource Online Auction, Inc. auctioneer services
  - Altisource Solutions, Inc. asset management services
  - Altisource Single Family, Inc. property preservation and field services
  - CastleLine® insurance services
  - Equator® default servicing platform
  - Granite Risk Management™ construction risk mitigation services
  - Hubzu® online real estate marketing platform
  - LendersOne® mortgage cooperative
  - Premium Title™ escrow and title services
  - REALHome® Services and Solutions real estate brokerage
  - REALSynergy® commercial real estate servicing platform
  - RentRange® rental data and analytics
  - Short Sale Program Management
  - Springhouse® valuations services
  - Trelix™/Altisource Fulfillment Operations mortgage fulfillment services
  - Vendorly® vendor management platform
  - Western Progressive/Power Default/Trustee Services foreclosure services
  - All Altisource businesses
- Type of request you would like to submit:
  - I would like to learn what personal data the business has collected about me
  - I would like to ask the business to delete my personal data to the extent permitted by law

You have the right under California law not to receive discriminatory treatment from us for the exercise of the privacy rights conferred by California law. Please be aware, however, that if we honor your request for deletion and we no longer possess your personal information, we may be limited in the scope of services or products that we can provide to you.

**Modifications to this Privacy Statement**

This Privacy Statement may be revised, modified, updated and/or supplemented at any time. Each time we amend the Privacy Statement, we will make it available on the Sites. Please review the Sites periodically.

**General**

Where applicable, you may exercise certain rights of access, rectification, erasure and portability of personal data, as well as restriction of, or objection to, the processing of your personal data in the conditions determined by applicable law. Contact us to exercise your rights or ask for additional information.