

# Privacy Statement

This document was last updated January 2024.

## 1.) ONLINE PRIVACY STATEMENT

This Privacy Statement describes the online information collection and use practices of the website [KeyFactorCo](#) (“KeyFactor”) and its corporate divisions and business affiliates. This Privacy Statement does not in any way describe KeyFactor’s offline information collection and use practices, or the practices KeyFactor employs when collecting information online through means other than the above listed website. An example of such additional information collection practices includes but are not limited to you as a customer of KeyFactor&Co LLC or site user sending KeyFactor an email message. “We” or “us” or “our” or “KeyFactor” refers to KeyFactorCo.com and its owners and/or affiliates. KeyFactor is strongly committed to protecting the privacy of our customers.

## 2.) CHILDREN’S ONLINE PRIVACY “COPPA” INFORMATION

The following explains our practices with respect to the online collection and use of personal information from children under the age of 13 and provides important information on your rights under federal law with respect to such information:

We do NOT knowingly collect personally identifiable information from children under the age of 13. We screen users who wish to provide personal information in order to prevent users under the age of 13 from providing such information. If we become aware that we have inadvertently received personally identifiable information from a user under the age of 13, we will immediately delete such information from our records. If we change our collection practices in the future, we will obtain prior, verifiable parental consent before collecting any personally identifiable information from children under the age of 13. If at any time we establish or begin providing services on any website that in anyway meets the criteria of COPPA we will ensure that full compliance is met in every aspect of COPPA.

Due to the fact we do NOT collect any personally identifiable information from children under the age of 13 we also do NOT knowingly distribute such information to any third parties.

We do NOT knowingly allow children under the age of 13 to become customers, or otherwise distribute personally identifiable contact information. Due to the fact we do NOT collect any personally identifiable information from children under the age of 13, we do NOT condition the participation in any online activities of a child under the age of 13 on providing personally identifiable information. However, even as outlined above we do NOT knowingly allow children under the age of 13 to access and use [KeyFactorCo](#) in general.

## 3.) ACKNOWLEDGEMENT AND ACCEPTANCE OF TERMS

KeyFactor, its divisions, and affiliates are committed to protecting your privacy. This Privacy Statement is current as of the updated date listed above and sets forth our current privacy practices with regard to the information we collect when you or your computer interacts with our

website(s). By accessing [KeyFactorCo](#) or any affiliates or divisions, you as the end user viewing this information and/or website acknowledge and fully understand KeyFactor's Privacy Statement and freely consent to the information collection and use practices described in this Privacy Statement. By submitting information to KeyFactor through this website or otherwise you are making an inquiry as to lending programs and services offered by KeyFactor and give KeyFactor permission to contact you through Email, fax, or telephone, or any means, even if your phone number is on a "Do Not Call" list.

If KeyFactor makes any substantive changes to this Privacy Statement we will announce it on our website(s) and revise the current date listed. If you have provided us with contact information, we will send you a notice to the email address we have on file for you. KeyFactor will not be responsible for inaccurate or outdated email addresses when supplying Privacy Statement updates. If you have any questions or concerns regarding this policy, contact us at [admin@keyfactorco.com](mailto:admin@keyfactorco.com). Once the changes have been made, your continued use and/or access of the website will constitute your acceptance and consent to the information collection and use practices described in the revised Privacy Statement.

#### **4.) PARTICIPATING ADVERTISER AND MERCHANT POLICIES**

[KeyFactorCo](#) may contain links to websites owned and operated by unaffiliated third parties. These links are provided as a service to you as a customer and/or user and do not constitute KeyFactor's endorsement or support of the third party websites or the information or content contained within the third party web sites. Related services and offerings with links from this website, have their own privacy statements that can be viewed by clicking on the corresponding links within each respective website. Unaffiliated third parties who provide information and links through KeyFactor are encouraged to participate in industry privacy initiatives and to take a responsible attitude towards privacy. However, since we do not have direct control over the policies or practices of participating merchants and other third parties, we are not responsible for and do not endorse the privacy practices or content of those sites. We recommend and encourage that you always review the privacy policies of any third parties before you provide any personal information or complete any transaction with such parties. Please contact each third-party provider directly if you have any questions about their privacy policies or the information they require for you to complete any transaction.

#### **5.) INFORMATION WE COLLECT AND HOW WE USE IT**

KeyFactor collects certain information from and about its customers and users, subject to the provisions as outlined in Section 2 above, in the following ways which include but are not limited to: directly from our web server logs and from cookies. [KeyFactorCo](#) also collects information volunteered by you in several areas, including loan applications, mortgage information requests, account pages, logins, site registrations, and surveys. Certain information we request for you to participate in certain features within the website(s) may include but not be limited to personally identifiable information such as name, address, telephone and fax numbers, email address, and billing information. We will at all times inform you at the time we collect information whether the information requested is necessary for you to participate in a particular feature or access a particular product on the website(s).

We will not disclose personally identifiable information we collect from you to third parties

without your permission except to the extent necessary including but not limited to the following:

- To fulfill your service requests for loan processing, services, or funding authorizations
- To respond to legal process including a court order or comply with federal, state or local law
- In connection with a merger, acquisition, or liquidation of KeyFactor or its affiliates and business divisions
- In connection with certain marketing services
- KeyFactor does not share, sell, or rent the consent of the customer to receive SMS messages to third parties

The information collected may also be used to respond to specific requests by you including sending you periodic information and special offers from KeyFactor or its affiliates and our sponsors and/or advertisers, to provide you with updates on offerings and features, to provide you with product information from affiliates in [KeyFactorCo](#) database, to provide notice of changes to Terms of Use and Privacy Statement. The information provided by you may also be used to better understand customers' interests and usage behavior, and may be collected and/or combined with information from affiliates of KeyFactor online or offline sources.

We may also supply the information you provide, on a strictly confidential basis, to service providers, such as title companies, appraisers, credit reporting services, etc., who assist us in qualifying, processing, closing and/or servicing your loan.

Credit Report Data: By submitting a loan application or a request to be pre-qualified to us, you authorize us to share your credit report with our affiliates only to process your loan application.

Newsletter Request: We may provide you with the opportunity to subscribe to E-newsletters and other Email based communications. You may unsubscribe by following the instructions provided in each Email newsletter. KeyFactor follows all CAN-SPAM Act 2003 regulations.

- Use of Cookies, Web Server Logs, and other electronic information collection mechanisms.

When you visit our website(s), we may track information to administer the site and analyze its usage. Examples of information we may track include:

- Your computer's Internet protocol address or IP address.
- The kind of web browser or computer you use.
- Number and type of links you click within the site.
- Locality including the state or country from which you accessed the site.
- Date and time of your visit(s).
- Name of your Internet service provider.
- Pages you viewed on the site.

IP addresses are collected for system administration purposes and for use in studying how people use our site(s) and how KeyFactor can improve the use of the site. KeyFactor may use cookies to personalize or enhance your user experience. A cookie is a small text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to

your computer. Cookies are uniquely assigned to you, and can only be read by a Web Server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize a web page or account, or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. Hence, this simplifies the process of delivering relevant content and eases site navigation by providing and saving your preferences and login information as well as providing personalized functionality.

KeyFactor may use cookies to identify customers and to automatically give them access to previously stored information. KeyFactor may also use cookies to estimate our audience size and usage patterns and to track the aggregate number of customer returns at our web site(s).

KeyFactor may also use cookies to simplify certain processes on the website(s) including but not limited to the filing out of certain forms.

You have the ability to accept or decline cookies by changing certain settings of your web browser. If you reject cookies by changing your browser settings then be aware that this may disable some of the functionality on our website.

KeyFactor may allow third-party companies, including ad networks, to serve advertisements, provide other advertising services and/or collect certain information when you visit our website.

Third-party companies may use non-personally identifiable information (e.g., click stream information, browser type, time and date, subject of advertisements clicked or scrolled over) during your visit to this web site in order to provide advertisements about goods and services likely to be of greater interest to you.

Third-party companies may use non-cookie technologies to recognize your computer or device and/or to collect and record information about your web surfing activity including your activities on this website. These technologies may be used directly on this website. Please keep in mind that your web browser may not permit you to block the use of these non-cookie technologies, and those browser settings that block cookies may have no effect on such techniques.

To learn more about Interest-Based Advertising or to opt-out of this type of advertising by those third parties that are members of self-regulatory programs such as the Network Advertising Initiative, please visit the NAI's website ([www.networkadvertising.org](http://www.networkadvertising.org)) which will allow you to opt out of Interest-Based Advertising by one, or all, NAI members.

## **6.) HOW WE DEAL WITH “DO NOT TRACK” SIGNALS**

Certain browsers may allow you to request that websites not track your activities over time and across third party websites or other online services by sending “do not track” signals to commercial websites like the Site. We DO follow the “do not track” directions provided by your browser.

## **7.) USE OF WEB BEACONS OR GIF FILES**

KeyFactor web pages may contain electronic images known as web beacons – sometimes also called single-pixel gifs or gif files – that allows KeyFactor to count users who have visited those

pages and to deliver co-branded services. KeyFactor reserves the right to include Web beacons in promotional e-mail messages or newsletters in order to determine whether messages have been opened and acted upon.

Some of these web beacons may be placed by third party service providers to help determine the effectiveness of our communications. These web beacons may be used by these third-party service providers to place a persistent cookie on your computer. This allows the service provider to recognize your computer each time you visit certain pages or emails and compile anonymous information in relation to those page views, which in turn enables us and our third-party service providers to learn which advertisements and emails bring you to our website and how you use the site. KeyFactor and its affiliates prohibit web beacons from being used to collect or access any customer personal information.

#### **8.) MEMBER ACCOUNTS AND ACCESSING**

You are required to create a member account to use services from KeyFactor. You can create an account through [KeyFactorCo](#) at any time by providing certain required information including your name, email address, certain financial information, company information/affiliation and creating a unique password. This will allow some of your information as outlined above to be stored for future service requests or closings at KeyFactor. We will provide you with the means to ensure that the contact information in your account file is correct and current. You may review and update this information by logging into your account online.

#### **9.) CHANGES TO PRIVACY STATEMENT**

As previously stated, KeyFactor has the discretion to update this privacy statement at any time. When we do, we will also revise the “updated” date at the top of this Privacy page. We encourage you to periodically review this privacy statement to stay informed about how we are helping to protect the information we collect. If you have provided us with contact information, we will send you a notice to the email address we have on file for you. KeyFactor will not be responsible for inaccurate or outdated email addresses when supplying Privacy Statement updates. If you have any questions or concerns regarding this policy, contact us at [admin@keyfactorco.com](mailto:admin@keyfactorco.com). Once the changes have been made, your continued use and/or access of the website will constitute your acceptance and consent to the information collection and use practices described in the revised Privacy Statement.

#### **10.) ADDITIONAL RIGHTS AND OPT-OUT PROTECTING YOUR IDENTITY AND CREDIT**

Credit reporting agencies may share your information with other companies when you apply for a home loan. This may cause you to receive email or phone calls that you did not ask for, offering credit cards, refinancing or other loan products.

You can stop these calls and emails by opting out of these prescreened credit offers. Simply call (888) 567-8688 or visit [www.optoutprescreen.com](http://www.optoutprescreen.com).

#### **CALIFORNIA PRIVACY RIGHTS**

CALIFORNIA CIVIL CODE § 1798.83 PERMITS OUR VISITORS WHO ARE CALIFORNIA RESIDENTS TO REQUEST CERTAIN INFORMATION REGARDING THEIR DISCLOSURES OF PERSONAL INFORMATION TO THIRD PARTIES FOR THEIR

## DIRECT MARKETING PURPOSES.

If you are a California customer and would like to make a request, please submit your request in writing to: KeyFactor&Company LLC, 7404 Executive Place, Suite L-30, Lanham, MD 20706, ATTN: Customer Support.

## 11.) WHAT DOES KEYFACTOR & COMPANY LLC DO WITH YOUR PERSONAL INFORMATION

KeyFactor is committed to treating and using personal financial information about you responsibly. The KeyFactor Privacy Policy explains what personal information we collect, why we collect it, how we protect it, and how and why in certain cases we may share it. We also tell you how to exercise your personal information sharing and use choices.

[View or print the KeyFactor Privacy Policy, What Does KeyFactor&Company LLC Do With Your Personal Information](#)

## 12.) CONTACTING US

If you have questions regarding this Privacy Statement, its implementation, failure to adhere to this Privacy Statement and/or the general practices of KeyFactor and its affiliates, including requests under California Civil Code, Texas Saving & Mortgage Lending, please contact us at [admin@keyfactorco.com](mailto:admin@keyfactorco.com) or send your request to:

KeyFactor&Company LLC  
Attention: Legal Inquiries  
7404 Executive Place, Suite L-30  
Lanham, Maryland 20706

KeyFactor&Company LLC and [KeyFactorCo](#) will use commercially reasonable efforts to promptly respond and resolve any problem or question.

Pending © Copyright KeyFactor&Company LLC All Rights Reserved. NMLS #24105982  
Equal Opportunity Lending