

Privacy Notice

In this notice, [Partner] (the “Company”) discloses information about its data processing practices. This notice is effective August 1, 2020. Terms that are defined in the California Consumer Privacy Act have the same meaning when used in this notice.

As described in more detail in this Notice, the main purpose of the Company’s collection and use of personal information is to communicate with licensed insurance agents and facilitate the sale of insurance products to individuals who express interest in such products.

I. Personal Information We Collect

The Company collects or obtains the following information:

Category	Examples
Identifiers	A real name, postal address, email address, Social Security number, driver’s license number.
Personal information categories listed in the California Customer Records statute	Physical characteristics or description, address, telephone number, insurance policy number, financial information, medical information, health insurance information.
Characteristics of protected classifications under California or federal law	Age, race, marital status, medical condition, sex, veteran or military status.
Commercial information	Products or services purchased.
Internet or other similar network activity	Information on a user’s interaction with our websites, applications, or advertisements.
Professional or employment-related information	Current or past job history.

The Company does not collect biometric information, geolocation data, sensory data, or non-public education information.

The majority of the information collected by the Company consists of contact information for licensed insurance agents and consumers seeking to purchase insurance products.

II. Sources of Personal Information

The Company may collect personal information from the following categories of sources:

- Directly from users when they provide information electronically, by phone, or by mail;
- Our affiliates and business partners;
- Client referrals;
- Data verification services for agents;
- Users' browsers;
- Marketing vendors and advertising networks; and
- Social media.

The Company obtains information pertaining to insurance agents primarily from the agents themselves when they choose to affiliate with the Company. The Company obtains information pertaining to consumers seeking to purchase insurance products from referrals and written and electronic consumer inquiries regarding insurance products (including through companies that assist in the delivery of such inquiries).

III. Use of Personal Information

The Company may use, sell, or disclose the personal information that it collects for one or more of the following purposes:

- Provide you products and services;
- Address your inquiries;
- Process transactions;
- Tailor the content and information that we may send or display to you;
- Where permitted, for marketing and promotional purposes, such as to provide information to you about the products and services we offer;
- Analyze use of our products and services;
- Develop new products and services;
- Provide and personalize our services;
- Comply with legal obligations; and
- Protect our rights, property, and safety or the rights, property, and safety of others.

The Company uses information pertaining to insurance agents to communicate with and compensate insurance agents. The Company uses information pertaining to consumers seeking to purchase insurance products to contact such consumers and provide policy services.

IV. Sharing Personal Information

The Company may disclose your personal information to a third party for a business purpose or sell your personal information, subject to your right to opt-out of those sales. The Company may share your personal information with licensed insurance agents, insurance carriers, service

providers, all primarily for the purpose of facilitating the sale of insurance products to individuals who are interested in purchasing insurance products.

In the preceding 12 months, the Company has disclosed the following categories of personal information for a business purpose: identifiers, California Customer Records personal information categories, protected classification characteristics under California or federal law, commercial information, and internet or other similar network activity.

In the preceding 12 months, the Company may have sold the following categories of personal information: identifiers, California Customer Records personal information categories, protected classification characteristics under California or federal law, commercial information, internet or other similar network activity. The information is sold to licensed insurance agencies and agents with whom the Company works regularly.

V. Rights and Choices for California Residents

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that the Company disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Your Rights), we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (also called a data portability request);
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that the Company delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Your Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless exception applies under the CCPA.

Right to Opt-Out of Sales

We do not sell the personal information of consumers we actually know are less than 16 years of age. If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time.

Exercising Your Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either calling us at <toll-free phone number> or visiting <website address>. To exercise the right to opt-out, you may submit a request to us by visiting the following webpage: [HYPERLINKED URL with the title “Do Not Sell My Personal Information”]

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. If you have an account with us, we may deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

VI. Non-Discrimination Under CCPA

We will not discriminate against you for exercising any of your CCPA rights. We will not (subject to CCPA exceptions):

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

VII. Contact Information

If you have any questions or comments about this notice, the ways in which the Company collect and use your information described below, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: [TOLL-FREE PHONE NUMBER]

Website: [Website]

Email: [Email]

Postal Address:

[Postal address]