

# Privacy Statement

**PLEASE READ THIS PRIVACY STATEMENT CAREFULLY  
BEFORE USING THIS WEBSITE.**

**Last updated: December, 2025**

## **About us and scope**

The Hartford Steam Boiler Inspection and Insurance Company and its affiliates and subsidiaries (“HSB”, “we”, “us”, or “our”) are committed to protecting the privacy of your personal data. This Privacy Statement applies to the website located at <https://hsbfrontdoor.com>; <https://hsbfrontdoor.com/ting>; <https://mycyberprotection.com> and <https://HSBTotCyber.com>. This Privacy Statement explains our policies and practices concerning collection, use, disclosure, and processing of your Personal Information collected through this Site. If you are viewing this Privacy Statement on this Site, please also review our Terms of Use. Your use of this Site is subject to this Privacy Statement and the Terms of Use. By using this Site, you acknowledge that you have read, understand and accept this Privacy Statement and the Terms of Use.

## **Personal Information We Collect**

We collect information that identifies, describes, relates to or is reasonably capable of being associated with you (“Personal Information”) on this Site and in the course of providing our services. The types of Personal Information that we collect vary depending on your relationship with us. For example, we collect and use different Personal Information according to whether you are an insured policyholder, a claimant, a customer to whom we provide inspection services, or a visitor of this Site.

We collect and use Personal Information to fulfill our intended business purposes. Personal Information does not include publicly available information or deidentified or aggregated information.

We may collection Personal Information directly from you and from other sources on this Site and to provide our services. The Personal Information collected may include:

- **Individual Identifiers and Contact Information (which may include Family Members)** such as full name, address, email address, telephone number, job title, company name, passwords on our systems, and relationship to the policyholder, insured, or claimant.
- **Government-Issued Identification Numbers** such as social security or national insurance number, driver’s license number or other government-issued identification numbers.
- **Account Information** such as your email, phone number, username and password if you create an account with us.

- **Policy or Claims Information** such as information and materials you provide to us in connection with your policy or as part of a claim, and other information you choose to provide to us.
- **Financial Information and Account Details** such as payment card number, bank account number or other financial account number and account details, billing address and other related information.
- **Contents of Communications** you choose to provide to us such as your emails, messages, and information you provide through online web forms.
- **Telephone Recordings** with our representatives and call centers for quality assurance and training purposes.
- **Photographs and Video Recordings** in connection with our insurance or business activities, including claims adjudication, disputes, or for other relevant purposes as permitted by law.
- **Marketing preferences, customer feedback, online forms and survey responses** such as information about the types of services you use, your marketing and communication preferences, voluntary survey responses, account preferences, and any other information you choose to provide.
- **Information We May Collect Automatically** such as IP address, unique device ID, device type, network and browsing history, interaction with this Site and services, and geolocation information.
- **Supplementary Information from Other Sources** such as publicly available information from social media services, information from commercially available sources and information from our affiliates, business partners and vendors such as agents, brokers, administrators, adjusters and other representatives. Examples include information about your insurance coverage or claim information.

## **Business and Commercial Purposes for Which Personal Information is Collected and Used**

The categories of Personal Information described above are collected and may be used and disclosed for the following business or commercial purposes:

- to provide you with, renew or modify products and services;
- to provide you with the information and documents you request and for other customer service purposes;
- to process claims and other legal actions;
- to provide you with information about our websites, mobile applications, or online services that link to our online Privacy Policy or required notices;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing, collections and payments;
- to deliver marketing communications or promotional materials that may be of interest to you and to assist us in determining relevant advertising;
- for advertising and marketing purposes, as well as underwriting and claims assessment and actuarial purposes, we may share your information with analytics service providers;
- to improve, enhance, and maintain the quality of services we provide and the usefulness of our websites, mobile applications and online services;
- to customize your experience and to analyze use of our websites, mobile applications and online services;

- to anonymize and aggregate data and reports to assess, develop and improve our products and services and for other analytics and research purposes;
- to comply with applicable laws;
- to respond to law enforcement requests, court orders or regulations, subpoenas, search warrants, other legal processes, or to perform other reporting obligations, as required by applicable law;
- to perform research, testing and product development and demonstrations;
- to prevent and detect fraudulent, malicious, deceptive, infringements of our policies and contracts and other potential misuse of or illegal activity relating to our products, services and assets;
- to carry out actuarial analysis and develop our actuarial and pricing models;
- to assist our affiliates in their everyday business purposes;
- to provide training or organize events;
- to investigate privacy, security or employment-related incidents;
- to refer you to our third-party partners as part of a referral program;
- to conduct financial, tax and accounting audits, and audits and assessments of our business operations or security and financial controls;
- to plan, engage in due diligence for, and implement commercial transactions;
- for employment-related purposes including but not limited to recruiting, hiring, onboarding, performance reviews and staffing decisions; human resource management services; administration of employee benefits, compensation and expenses; maintenance of contact information; conducting healthcare-related services; and provide alerts and notices;
- to evaluate or conduct a merger, acquisition, restructuring, reorganization, divestiture, dissolution or other sale or transfer of some or all of our assets as a going concern or as part of bankruptcy, liquidation or similar proceeding;
- to secure our offices, premises and physical assets, including through the use of electronic access systems; and
- as described to you when collecting your Personal Information or as otherwise permitted under applicable law.

We will not collect additional categories of Personal Information or use the Personal Information collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Disclosure of Your Personal Information**

We may disclose your Personal Information as permitted by applicable law, and with your consent where required, as follows:

- to vendors and service providers to perform services on our behalf and other services related to our business such as processing claims, policy servicing and customer support, communication services, advertising and marketing, website services and analytics, research, and tax, legal and accounting services.
- to subsidiaries, affiliates, agents, brokers in performance of our Services and to business partners to offer products and services.
- to advertising and marketing partners to send you information about our Services.
- for commercial transactions such as acquisitions, mergers, asset sales or transfers, bankruptcy or reorganization.
- to address legal matters such as compliance with law or a subpoena, a judicial proceeding, court order, government, regulator or law enforcement requests, or other legal process.

- to prevent fraud, respond to suspected or actual illegal activity, respond to or investigate an audit, complaint or security threat, violations of this Statement or our Legal Terms of Use, and to protect and defend our and others' legal rights, safety and security.
- we may disclose deidentified or aggregate information for commercial and legitimate business purposes. We will maintain and use deidentified information without attempting to reidentify it other than as permitted by law.
- we may disclose Personal Information in other ways not already described with prior notification to you and, if needed, we will obtain your consent.

## **Transmitting your Personal Information**

Please be aware that Personal Information collected through this Site may be transferred to, stored in, or processed in the United States or Europe, where our servers are located and our database is operated, or where our affiliates or third-party service providers servers or databases are located. We only share your Personal Information in order to fulfill the business and commercial purposes for which you provide it to us (which are listed above).

## **Security**

We have implemented physical, administrative, and technical safeguards designed to protect your Personal Information from loss and unauthorized access, disclosure, use, alteration and destruction. However, despite the measures we take, we cannot guarantee data security.

## **Data Collected Automatically**

## **Use of Cookies**

While you are online, your computer saves "cookies." A "cookie" is a small file, typically of letters and numbers, that is saved to your device or your browser's memory. Cookies contain information about your visit to this Site and serve to make this Site more user-friendly, effective and secure.

Some of the cookies that we use are "session cookies," which are automatically deleted as soon as you leave this Site. Other cookies remain on your device until you delete them, which allows us to recognize your browser the next time you visit. Cookies that remain on your device may allow your browser to load previously viewed pages faster.

We often save cookies and analyze them. This allows us to improve the usefulness of this Site and helps us provide the best possible experience. These cookies do not reveal your specific identify (e.g., your name), but may include information related to your device or location (e.g., your IP address). We perform anonymous statistical analyses of our internet presence (e.g., tracking the number of times you visit this Site, tracking the number of visitors to this Site, analyzing your interactions with this Site), and do not identify you personally in such analyses.

You can change your browser settings so that you are notified when cookies are being used. You can also change your browser settings to allow cookies only once, refuse them completely or refuse them just in certain cases. You may also activate the automatic deletion of cookies when you close your browser. Deactivating cookies may restrict this Site's functionality and impact or impair your experience on the Site(s).

Below, we explain the cookies that we use and why:

<https://hsbfrontdoor.com>

Source	Cookie name	Purpose/Content	More Information
hsbfrontdoor.com	ApplicationGatewayAffinity	LoadBalancer cookie (Cookiebased Affinity) / Random string to identify the server, the request should be sent to (no PI data)	Session Cookie
hsbfrontdoor.com	JSESSIONID	To maintain http session / Random string (no PI data)	Session Cookie
hsbfrontdoor.com	QSI_HistorySession	This cookie stores what pages a visitor has visited for the current session (no PI data)	Session Cookie
hsbfrontdoor.com	saml_request_path	This cookie stores the page to which the user will be redirected to after logging in (no PI data)	Session Cookie
hsbfrontdoor.com	Languagepage	This cookie stores the language page user signed in/registered from, to redirect user to same language page (no PI data)	1 year
hsbfrontdoor.com	login-token	This cookie stores an unique AEM session ID for logged-in user (no PI data)	Session Cookie

hsbfrontdoor.com	Entity	This cookie stores the value of entity, which is fetch from the URL / EIL or BII or IIC (no PI data)	Session Cookie
hsbfrontdoor.com	time-out-request	This cookie is set to let system know that user's session	Session Cookie

		is timed out or intentionally logged out / 'Y' (no PI data)	
hsbfrontdoor.com	AMCV_###@AdobeOrg	This cookie is used to identify a unique visitor	2 years
mruscloud.com	AMCV_###@AdobeOrg	This cookie is used to identify a unique visitor	2 years
hsbfrontdoor.com	AMCVS_###@AdobeOrg	This cookie collects anonymous information about how visitors use the website	Session Cookie
mruscloud.com	AMCVS_###@AdobeOrg	This cookie collects anonymous information about how visitors use the website	Session Cookie
hsbfrontdoor.com	s_sq	This cookie is set and read by the JavaScript code when the ClickMap functionality and the Activity Map functionality are enabled; it contains information about the previous link that was clicked on by the user	Session Cookie

mruscloud.com	s_sq	This cookie is set and read by the JavaScript code when the ClickMap functionality and the Activity Map functionality are enabled; it contains information about the previous link that was clicked on by the user	Session Cookie
hsbfrontdoor.com	s_cc	This cookie is set and read by the JavaScript code to determine if cookies are enabled (simply set to "True")	Session Cookie
mruscloud.com	s_cc	This cookie is set and read by the	Session Cookie
		JavaScript code to determine if cookies are enabled (simply set to "True")	
demdex.net	Demdex	Audience Manager sets this cookie to assign a unique ID to a site visitor. The demdex cookie helps Audience Manager perform basic functions such as visitor identification, ID synchronization, segmentation, modeling, reporting, etc. / The demdex cookie contains a Unique User ID (UUID)	Session Cookie
hsbfrontdoor.mruscloud.com	x-ms-cpim-sso:hsbaadprodp01.onmicrosoft.com_0	To maintain the session of the user from AAD side.	Session Cookie

hsbfrontdoor.com	Userdetails	Used for storing the invited user's details (email id, timestamp, group id, language, entity)	15 days
hsbfrontdoor.com	samlRequest	Contains SAML request generated from AEM to send to AAD (no PI data)	session
hsbfrontdoor.com	skipSSO	Used to detect if user is internal SSO or not (no PI data, only contains 'false' as value)	7 days
hsbfrontdoor.com	Logoutpage	Used to save current page path, to redirect the user to the same locale logout page	session
hsbfrontdoor.com	deeplink	Used to navigate the user to the requested application after a successful login	session

<https://hsbfrontdoor.com/ting> (In Addition to above)

<https://mycyberprotection.com> <https://HSBTotalCyber.com>

Source	Cookie name	Purpose/Content	More Information
hsbfrontdoor.com/ting mycyberprotection.com HSBTotalCyber.com	ApplicationGatewayAffinity	LoadBalancer cookie (Cookie-based Affinity) / Random string to identify the server, the request should be sent to (no PI data)	Session Cookie
hsbfrontdoor.com/ting mycyberprotection.com HSBTotalCyber.com	s_sq	This cookie is set and read by the JavaScript code when the ClickMap functionality and the Activity Map functionality are enabled; it contains information about the previous link that was clicked on by the user	Session Cookie



hsbfrontdoor.com/ting mycyberprotection.com HSBTotalCyber.com	s_cc	This cookie is set and read by the JavaScript code to determine if cookies are enabled (simply set to "True")	Session Cookie
hsbfrontdoor.com/ting mycyberprotection.com HSBTotalCyber.com	Demdex	Audience Manager sets this cookie to assign a unique ID to a site visitor. The demdex cookie helps Audience Manager perform basic functions such as visitor identification, ID synchronization, segmentation, modeling, reporting, etc. / The demdex cookie contains a Unique User ID (UUID)	Session Cookie
hsbfrontdoor.com/ting mycyberprotection.com HSBTotalCyber.com	Usertype	Used to find out whether the user is Internal/External (0 for Internal, 1 for External)	session
hsbfrontdoor.com/ting mycyberprotection.com HSBTotalCyber.com	Cookieacct	Used to find out whether the user accepted cookies or not (Y for Accepted, N for Not Accepted)	session

## Server Log Files

Data that your browser sends us is collected automatically and saved in server log files. They contain:

- Browser type, version, location and carrier
- Operating system used
- Referrer URL (the URL that the user comes from)
- Host name (network name) of the accessing computer
- Time of server request

This data cannot be traced to individual people. We do not merge this data with other data sources. We reserve the right to review the information subsequently, and report it to authorities (such as the police or public prosecutor's office), if there are concrete indications that our internet presence is being used illegally (for example, a hacking attack on our network).

## Web analytics tools and other technologies

We use web analytics tools and applications, such as Adobe Analytics, to collect data so that we may better understand our traffic and make this Site more user-friendly, efficient, and secure. Data collected automatically includes, IP addresses, user group and preference information, browser types, carrier and location, referring pages, pages visited and viewed, link clicks, login date and time spent

on this Site. For more information about Adobe Analytics and your choices regarding Adobe Analytics cookies, please visit: <https://www.adobe.com/privacy/opt-out.html>.

## **Email communications**

You can opt out of receiving email marketing communications from us by using the “unsubscribe” link in any marketing email we send you. If you opt out of receiving marketing messages, we may still send you non-marketing communications regarding the services we provide to you.

## **Do Not Track**

We do not respond to web browser “Do-Not-Track” signals at this time.

## **Childrens’ Privacy**

This Site and our services are not directed to, and we do not intend to or knowingly collect Personal Information from children under 13. If we learn that we have collected any Personal Information from a child under the age of 13 without verifiable parental consent, we will delete that information from our files as quickly as possible. If you believe that we may have collected information from a child under 13, please contact us at the email address provided below.

## **External Links**

This Site may include links to websites that are operated by organizations we do not own or control. We are not responsible for the content or privacy practices of linked websites or their collection or use of your information. If you leave this Site via such a link, you should review those other websites' privacy policies, terms of use, and other notices before providing your information to learn how they will handle any information they collect from you.

## **Changes to Our Internet Privacy Statement**

We may, from time to time, make changes to or modify the Privacy Statement that applies to this Site. The most recent version is always available on this Site. If we make changes to this Privacy Statement, we will provide the date it was Last Updated at the top of this page and post it on this Site. To the extent permitted by law, any changes or modifications will be effective immediately upon posting. Your continued access to and use of this Site and services after this Privacy Statement has

been modified constitutes your acceptance of the revised Statement. We recommend that visitors to this Site revisit this Privacy Statement periodically to learn of new privacy practices and changes to our Statement.

## How to Contact Us

If you have any questions or comments about this Privacy Statement or other privacy-related inquiries, please contact us at:

The Hartford Steam Boiler Inspection and Insurance Company  
Attn: Corporate Communications  
One State Street  
Hartford, CT 06102-5024

Email: [customer\\_solution\\_center@hsb.com](mailto:customer_solution_center@hsb.com)  
Telephone: 1-800-472-1866

## ADDITIONAL PRIVACY STATEMENT FOR CALIFORNIA RESIDENTS

This section supplements our Privacy Statement and provides specific information for residents of California ("consumers" in this section), and is intended to satisfy the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 (collectively, referred to as "CPRA"). The CPRA requires that we provide certain information to California consumers about how we handle your Personal Information that we have collected, whether online or offline. Under the CPRA, "Personal Information" is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household, including the categories of Personal Information identified in a table below to the extent they identify, relate to, describe, are reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household.

This section of our Privacy Statement applies to the website located at <http://www.hsbfrontdoor.com> ("this Site") and related services and offline activities where California residents are directed to this section of our Privacy Statement. It does not apply to any third party websites or applications that you may access via services, which are governed by the privacy policies and terms of use that appear on those sites and applications.

If you are a California resident and would like to exercise your rights under the CPRA, please:

- Click [here](#) and complete the form; OR
- Contact us at this toll-free telephone number: 1-844-960-3128 and when prompted, input PIN number 306104

Our CPRA Notice at Collection is found [below](#).

## **When We Are Acting as a Service Provider**

In some circumstances, we act as a service provider under the CPRA and collect and use Personal Information on behalf of another unaffiliated company. Where your Personal Information is processed by us when acting as a service provider, the other company's privacy policy will apply, and requests to exercise CPRA rights should be submitted directly to that company. In other circumstances, we act as a service provider for one of our own affiliated companies, and in that situation this section of the Policy will apply. If you make a request to exercise CPRA rights to us where we are acting as a service provider under the CPRA, we may be required to disclose your request to the company for which we are acting as a service provider.

## **Personal Information Not Covered by the CPRA**

For purposes of this Additional Privacy Statement for California residents, the following Personal Information is not covered by the CPRA and does not include:

- Publicly information lawfully made available from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CPRA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## **CALIFORNIA NOTICE AT COLLECTION**

### **Categories of Personal Information Collected, Disclosed, Sources and Whether Sold or Shared**

The type of information we collect from you depends on how you interact with us. The table below lists the categories of Personal Information that we have collected from California residents and have disclosed to others for a business purpose in the preceding twelve (12) months, the categories of sources of Personal Information from which the Personal Information is collected, and whether we sell or share each collected category of Personal Information. Some Personal Information included in the categories below may overlap with other categories.

We collect Personal Information from the following categories of sources and their representatives: our prospective and actual policyholders; other insured persons; corporate policyholders and companies we reinsure; reinsurance intermediaries of the companies we reinsure; claimants; others with information about the risk that we are insuring or reinsuring or about a claim; prospective and actual agents; our policyholders' agents; brokers; prospective and actual business partners, vendors,

contractors and service providers; our affiliates; third party administrators; adjusters; investigators; third party data providers; consumers who access our internet websites, internet forms and applications; and from consumers in connection with research and outreach.

We may disclose for a business or commercial purpose each of the categories of Personal Information described in the table below to the following categories of parties: vendors and service providers, agents, brokers, regulators, auditors, counsel, consultants, reinsurers, retrocessionnaires, advisors, representatives, our affiliates and subsidiaries, other website users, business partners, advertising networks, banks, operating systems or platforms, law enforcement, government entities and courts.

For more information about the business and commercial purposes for which we may collect or disclose such information, please review the "Business and Commercial Purposes for which Personal Information is Collected and Used" section in our general [Privacy Statement](#) for this Site above.

Categories Collected & Disclosed in the last 12 months	Personal Information Examples	Collected	Categories of Sources	Disclosed for Business or Commercial Purpose	Sell or Share
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. Some identifiers included in this category may overlap with other categories.	Yes	From you directly From you directly and automatically From agents and brokers From our corporate clients From our service providers	Yes	No – do not sell  No – do not share.

Personal Records information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	Yes	From you directly  From agents and brokers  From our corporate clients  From our service providers	Yes	No – do not sell  No – do not share
Characteristics of Protected Classifications under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion, marital status, pregnancy, medical condition, physical or mental disability, sex, sexual orientation, and veteran or military status. Some protected classification characteristics included in this category may overlap with other categories.	Yes	From you directly  From agents and brokers  From our corporate clients  From our service providers	Yes	No – do not sell  No – do not share
Commercial Information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No	Not applicable	Not applicable	Not applicable

Biometric Information	An individual's physiological, biological or behavioral characteristics, including DNA information that can be used to establish individual identity. includes imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings from which an identifier template such as a faceprint, voiceprint can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data containing identifying information.	Yes	From you directly  From our service providers	Yes	No – do not sell  No – do not share
-----------------------	---	-----	---	-----	---

Internet or network activity information	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, information regarding a consumer's interaction with internet websites, applications, or advertisements.	Yes	From you directly automatically and from other sources	Yes	No - do not sell  No – do not share.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes and student disciplinary records.	Yes	From you directly  From agents and brokers  From our corporate clients  From our service providers	Yes	No – do not sell  No – do not share
Geolocation Data	Physical location or movements.	Yes	From you directly and automatically  From our service providers	Yes	No – do not sell  No – do not share
Audio, Electronic, Visual, Thermal, Olfactory or similar information	Call recordings, video and photographs.	Yes	From you directly and automatically	Yes	No – do not sell  No – do not share
			From our service providers		
Professional or employment-related information	Employment history, qualifications, licensing, performance evaluations and disciplinary record.	Yes	From you directly  From our service providers	Yes	No – do not sell  No – do not share

Inferences drawn from other Personal Information	Inferences drawn from any of the Personal Information described in this section about an individual to create a profile including inferences reflecting the individual's preferences, characteristics, behavior and abilities.	Yes	From you automatically and from other sources	Yes	No – do not sell  No – do not share
Sensitive Personal Information	Social security number, driver's license number, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation (a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet); racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; genetic data; processing of biometric information for the purpose of uniquely identifying a consumer; Personal Information collected and analyzed concerning a consumer's health; Personal Information collected and analyzed concerning a consumer's sex life or sexual orientation.	Yes	From you directly  From agents and brokers  From our corporate clients  From our service providers	Yes	No – do not sell  No – do not share

### Retention of Personal Information

We retain the Personal Information we collect only as reasonably necessary for the purposes described in this Statement or otherwise disclosed to you at the time of collection. We will retain certain Personal Information for as long as it is necessary pursuant to our records retention guidelines. Our records retention guidelines are based on our legal or business needs including but not limited to the following criteria: legal and regulatory obligations and requirements; contractual requirements owed to third parties; operational, fiscal, administrative or historical value to business operations; the duration of our business relationship with you, your employer or another related entity; the possibility of future complaints; whether the record is part of an insurance or reinsurance transaction or claim file; audits; investigations or litigation or the likelihood of these; the possibility of future insurance or



reinsurance claim activity; whether the documentation is needed for processing of financial records; statutes of limitations; health and safety requirements; tax requirements; personnel requirements; corporate governance requirements; and record-keeping requirements.

## **Deidentification of Personal Information**

We may deidentify Personal Information and use it for our internal purposes. We commit to maintaining and using this information in deidentified form and will not attempt to reidentify the information, except to determine whether our deidentification process satisfies the CPRA.

## **Your Rights and Choices Regarding Your Personal Information**

This section describes the specific rights California consumers have regarding their Personal Information under the CPRA, subject to certain exceptions, and how to exercise those rights:

**Right to Know:** You have the right to request from us, up to two (2) times per year and subject to certain exemptions, the Personal Information we have collected about you in the prior twelve (12) months including:

- the categories of Personal Information;
- the categories of sources from which we collect the Personal Information;
- our business or commercial purpose for collecting, selling, or sharing the Personal Information;
- the categories of third parties to whom we have disclosed the Personal Information; and
- the specific pieces of Personal Information we have collected about you.

**Right to Delete.** You have the right to request deletion of Personal Information we have collected from you under certain circumstances, subject to certain exceptions.

**Right to Correct.** You have the right to request correction of inaccurate Personal Information we maintain about you, subject to certain limitations.

**Right to Opt-Out of Sale or Sharing of Personal Information:** If a business “sells” or “shares” Personal Information as those terms are defined under the CPRA, you have the right to opt-out of the sale or sharing of your Personal Information. We do not and will not sell or share your Personal Information.

**Right to Limit Use and Disclosure of Sensitive Personal Information.** We do not use or disclose sensitive Personal Information other than for limited purposes permitted under the CPRA and, as such, are not required to offer a consumers a right to limit its use.

**Right to Non-Discrimination.** We will not discriminate against you for exercising any of your privacy rights under the CPRA.

## **Incentives**

The CPRA imposes requirements on any financial incentives offered to California consumers related to their Personal Information. Businesses may offer different prices, rates, or quality of goods or services if the difference is reasonably related to the value of the consumer's data.

## **How to Exercise Your Rights**

If you are a California resident and would like to exercise your rights under the CPRA, please:

- Click [here](#) and complete the form; OR
- Contact us at this toll-free telephone number: 1-844-960-3128 and when prompted, input PIN number 306104

**Authorized Agent.** You may designate an authorized agent to submit requests and act on your behalf. We require authorized agents to provide proof of their authorization from you.

**Identity Verification.** We will validate your identity and the identify of anyone making a request on your behalf relating to your Personal Information. The information we request to verify your identity may vary depending on the type of request and your relationship with us. Where feasible, we will match the identifying information you provide to the Personal Information we already maintain about you. We may in some instances request additional Personal Information from you which we will use only to verify your identity and will delete as soon as practical after responding to your request, except if we need to retain it to comply with CPRA recordkeeping requirements. If we are unable to verify your identity after a good faith attempt, we may deny your request and we will explain the reason for the denial.

We will respond to your request within the period of time required under law and will notify you if it is reasonably necessary for us to extend our response time.