

## Glencar Insurance Company CCPA Policy for California Residents

**Effective Date:** [October 1, 2020]

**Last Updated on:** [September 22, 2020]

We value your business and your trust in Glencar Insurance Company (“**GIC**,” “**we**,” “**our**,” or “**us**”). The privacy and confidentiality of your personal information is among our top priorities. This CCPA Policy applies solely to residents of the State of California (“**consumers**” or “**you**”) and describes the personal information we collect about you and how we use and protect it before, during and after your relationship with us (the “**CCPA Policy**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended (“**CCPA**”) and, unless defined in this CCPA Policy, any terms defined in the CCPA have the same meaning when used in this CCPA Policy. If you are viewing this CCPA Policy offline, you can also access it online at <https://glencarinsurance.com/privacy-policy>.

### **COLLECTION OF PERSONAL INFORMATION**

The type of personal information we collect may vary depending on your relationship with us. For this reason, we may collect, and over the prior 12 months may have collected, the following categories of personal information from consumers:

1. **Identifiers**, such as name, contact information (e.g., postal address, telephone number, email address), IP address, government-issued ID numbers (e.g., Social Security number, driver’s license number, passport number), account name, and other similar identifiers.
2. **Personal information as defined in the California Customer Records law**, such as name, signature, contact information, government-issued ID numbers, insurance policy numbers, payment card data, and education, employment, and medical or financial information.
3. **Characteristics of protected classifications under California or federal law**, such as age, marital status, gender, medical condition, and physical or mental disability.
4. **Commercial Information**, such as transaction information, purchase history, financial details, and payment information.
5. **Internet or other electronic network activity information (“Internet or Network Activity”)**, such as browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.
6. **Audio, electronic, visual, or similar information**, such as audio, video or call recordings created in connection with our business activities.
7. **Professional or Employment-related Information**, such as job title as well as work history and experience.
8. **Inferences drawn from any of the other personal information listed above** to create a profile about a consumer reflecting the consumer’s characteristics or behavior, such as driving habits or account transactions.

Personal information does not include (i) publicly available information from government records; (ii) deidentified or aggregated consumer information; (iii) information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, Gramm-Leach-Bliley Act or California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994; and (iv) medical information governed by the California Confidentiality of Medical Information Act or protected health information collected by a covered entity or business associate governed by the Health Insurance Portability and Accountability Act of 1996.

## **SOURCES OF PERSONAL INFORMATION**

We may have obtained the categories of personal information listed above from the following sources:

- Directly from you, such as from information received on applications and other forms you complete, whether in writing, in person, by phone, electronically or by other means.
- Indirectly from you, such as from observing your actions when you use or interact with our website.
- From our parents, affiliates, and subsidiaries.
- From our business partners and other third parties who help us manage our business, such as third party administrators, data aggregators, insurance agents and brokers, and investigators connected with claims adjusting and inspection services or who otherwise interact with us as permitted or required by law, such as consumer reporting agencies, state motor vehicle departments, government entities, and law enforcement authorities.

## **USE OF PERSONAL INFORMATION**

We may use or disclose the personal information we collect and, over the past 12 months, may have used or disclosed the personal information we have collected, for one or more of the following business or commercial purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our insurance products and services, we will use that personal information to respond to your inquiry.
- To process transactions on your behalf, and information about you or about participants, beneficiaries or claimants under your insurance policy in the normal course of business.
- To underwrite and issue, maintain, and renew insurance policies, or related products, obtain reinsurance, and process claims under an insurance policy, or related contract and to communicate with you throughout this process.
- To collect premium payments, collect purchase payments, collect reinsurance proceeds, purchase reinsurance, pay insurance claims, pay third parties and other payees, and make other business-related payments.
- To create, maintain, customize, and secure your account with us.
- To contract with service providers to perform business, professional or insurance functions on our behalf.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, quality, and integrity of our website, products and services, databases and other technology assets, and business, including to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity, and to debug to identify and repair errors that impair existing intended functionality.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of GIC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by GIC about our consumers is among the assets transferred.
- To comply with our legal, regulatory, and contractual obligations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

GIC will not collect additional categories of personal information or use the personal information we collected for additional purposes without providing you notice.

## **SHARING PERSONAL INFORMATION**

### ***Disclosures of Personal Information for a Business Purpose***

We do not disclose any consumers' personal information to anyone, except as permitted or required by law or as otherwise set forth in this CCPA Policy. In the preceding 12 months, we may have disclosed any of the categories of personal information listed above (except for Internet and Network Activity) as defined in the *Personal Information We May Collect* section of this CCPA Policy for a business purpose to the following categories of third parties:

- our parents, affiliates, subsidiaries, and business partners;
- government entities;
- professional advisors (e.g., accountants, auditors, insurers, lawyers, bankers);
- IT vendors, data aggregators, records management and data storage providers;
- insurance-related business partners and third parties (e.g., underwriters, actuaries, appraisers, brokers, agents, advisors, and adjusters; claims administrators; and
- investigators connected with claims adjusting and inspection services); and authorized representatives and successors in interest (e.g., your personal representative, beneficiary, or other legally authorized successor to your interest in your insurance policy).

In the preceding 12 months, we may have disclosed Internet or Network Activity as defined in the *Personal Information We May Collect* section of this CCPA Policy for a business purpose with our IT vendors, data aggregators, records management and data storage providers.

### ***Sales of Personal Information***

GIC does not sell consumers' personal information and has not sold consumers' personal information in the preceding twelve (12) months.

## YOUR RIGHTS AND CHOICES

The CCPA provides consumers (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 GIC disclose certain information to you about our collection, use, disclosure, and sale (if applicable) of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources from which the personal information was collected.
- Our business or commercial purpose for collecting or, if applicable, selling the personal information.
- The categories of third parties with whom we share the personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business or commercial purpose, two separate lists identifying: (i) the categories of personal information disclosed, and the categories of third parties to whom the personal information was disclosed; and (ii) if applicable, the categories of personal information sold, and the categories of third parties to whom the personal information was sold.

### Deletion Request Rights

You have the right to request that GIC delete any of your personal information that we have collected or maintained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act.
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's

deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling (800) 221-1076;
- Emailing [CPReport@gc-ins.com](mailto:CPReport@gc-ins.com);
- Visiting [www.glencarinsurance.com](http://www.glencarinsurance.com); and/or
- Mailing Glencar Insurance Company, Attn: Privacy Officer, 500 Park Blvd, Suite 805, Itasca, IL 60143

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf (an "Authorized Agent"), 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. We are not obligated to provide information to you in response to your verifiable consumer request for access or portability more than twice in 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 Agent.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We are unable to fulfill 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. With few exceptions, we will only review and fulfill a request from your Authorized Agent if (a) you grant the Authorized Agent written permission to make a request on your behalf, (b) you or the Authorized Agent provides us notice of that written permission, and (c) we are able to verify your identity in connection with that notice and the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **Verifying Your Identity**

Before completing your request to exercise the below, we will verify that the request came from you by comparing the identifying information provided by you in your request with any personal information we maintain about you at that time. For all requests, we will need the consumer's full name plus the following information: (i) date of birth; (ii) residential or billing address; and (iii) last four digits of the consumer's Social Security number.

To protect the privacy and security of your personal information, we may request additional information from you to help us verify your identity and process your request. This information may include your email address, insurance policy number, insurance claim number, and/or driver's license or other government-issued identification number. We may also contact you to ask you for further information in relation to your request to speed up our response. You may also be asked to complete and provide a signed declaration under penalty of perjury that you are the consumer who is the subject of the request in certain circumstances.

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing. 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. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

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.

### **Non-Discrimination**

You have a right to not receive discriminatory treatment by us for exercising your rights under the CCPA. Unless permitted by the CCPA:

- You will not be denied goods or services.
- You will not be charged different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- You will not be provided a different level or quality of goods or services.
- You will not receive suggestions that you could obtain a different price or rate for goods or services or a different level or quality of goods or services.

### **CHANGES TO OUR CCPA POLICY**

We reserve the right to amend this CCPA Policy from time to time. When we make changes to this CCPA Policy, we will post the revised CCPA Policy on this page with a new "Last Updated" date.

### **CONTACT INFORMATION**

If you have any questions or comments about this CCPA Policy, the ways in which GIC collects and uses your information described in this CCPA Policy or GIC's Privacy Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

4837-4380-8458.3

Phone: (800) 221-1076

Email: [CPReport@gc-ins.com](mailto:CPReport@gc-ins.com)

Website: [www.glencarinsurance.com](http://www.glencarinsurance.com)

Postal Address: Glencar Insurance Company, Attn: Privacy Officer, 500 Park Blvd, Suite 805, Itasca, IL 60143