

Catalina U.S. Insurance Services LLC

Privacy Policy

Effective Date: January 15, 2020

Catalina U.S. Insurance Services LLC (“CUSIS”), and its U.S. affiliates (together, the “Company”, “we”, “our”, or “us”) listed at the end of this Privacy Policy under [CONTACT INFORMATION](#), are committed to protecting your personal information (“PI”). The purpose of this Privacy Policy is to provide a comprehensive description of the Company’s online and offline practices regarding the collection, use, disclosure, and sharing of your PI for various insurance purposes, and of your rights regarding your PI, as the Company’s customer, policyholder or claimant. If you have questions regarding this Privacy Policy or the collection of PI, you may contact us using the methods provided in the [CONTACT INFORMATION](#) section at the end of this Privacy Policy.

In addition, a federal law (the Gramm-Leach-Bliley Act or “GLBA”) offers special protection for non-public personal information that is collected from you to obtain from us insurance products or services to be used primarily for personal, family, or household purposes, and requires us to provide a notice regarding what information we collect for those purposes and what we do with it. Please click here to access this notice (the GLBA Privacy Notice)

[THE PERSONAL INFORMATION WE MAY COLLECT FOR A BUSINESS PURPOSE](#)

The categories of PI the Company may collect, as well as examples of each, include:

- **Personal identifiers** (such as your name, email address, mailing address, phone number, Social Security number, Driver’s License number, Tax Identification number, and signature)
- **Customer Records PI** (such as insurance policy number and claim number)
- **Financial Information** (such as bank account and credit/debit card number)
- **Protected classification characteristics under state or federal law** (such as race, citizenship, marital status, gender, medical condition, military status)
- **Commercial information** (such as records of personal property, products or services purchase)
- **Professional or Employment information** (such as occupation, title, and prior employment history)
- **Education information** (such as education records, transcripts, student disciplinary records)
- **Biometric information** (such as fingerprints, gait, and voiceprints)
- **Sensory information** (such as audio, visual, and voice messages)
- **Geo-location information** (such as physical location or movements)
- **Internet or other Electronic Network Activity information** (such as IP address, device type, and operating system)
- **Inferences drawn** from the above categories of personal information reflecting your preferences, characteristics, behaviors, psychological trends, attitudes and abilities

In addition to the above categories, you may choose to provide us with additional pieces of information when you fill in a form, update or add information to your records, or interact with us in other ways.

[HOW WE COLLECT PERSONAL INFORMATION](#)

We collect your PI from a variety of sources. For example, we may have collected PI when you requested a quote for insurance coverage, purchased an insurance policy, or submitted a claim to us. The following are the categories of sources from which we may collect your PI:

- Directly from you and other consumers through your direct interactions with us regarding an insurance matter; Indirectly from you through your insurance agent/producer/broker; legal counsel, medical provider; our claims administrators; or other third party service providers or business partner;
- Through our websites, when you send us an email or complete a web form making a request regarding your PI;
- From government agencies or public records;

- Through automated technologies and online browser tools, including the use of cookies; and
- From third party service providers or business partners.

If you choose to submit any personal information relating to other people, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy.

THE REASONS WE COLLECT, USE, AND SHARE PERSONAL INFORMATION

We may use, share, or disclose the PI we collect from our customers, policyholders or claimants for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information such as:
 - ✓ Administering an insurance policy;
 - ✓ Administering insurance claims under an insurance policy, including our ability to make decisions over insurance claims which we could not otherwise make;
 - ✓ Respond to insurance regulator inquiries;
 - ✓ Exercising a right, or complying with an obligation, arising in connection with an insurance policy, including a legal right or obligation; or
 - ✓ Statistical analysis in the ordinary course of our regulated insurance business administration.
- To prevent insurance fraud.
- To maintain, customize, and secure your past insurance policy information with us.
- To comply with applicable law, court order, or governmental regulations, including required record retention.
- To process your requests, transactions, and prevent transactional fraud.
- To communicate with you and to provide you with support and respond to your inquiries, including investigating and addressing your concerns and monitoring and improving our responses.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and service development, including developing and improving our services.
- To respond to law enforcement requests.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which PI held by the Company is among the assets transferred.
- As described to you when collecting your PI or as otherwise set forth.

The Company will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

SHARING PERSONAL INFORMATION

The Company may share your PI to a third party for a business purpose. When we disclose PI for a business purpose, we enter into an agreement that describes the purpose and requires the recipient to both keep that PI confidential and not use it for any purpose except performing the obligations laid out in the agreement.

We may share your PI with the following categories of third parties:

- Third Party Claims Administrators
- Service Providers, including but not limited to, our information technology partners, health care providers and law firms

- Data aggregators and rating organizations, such as Insurance Services Office (ISO) and National Council on Compensation Insurance (NCCI)

The Company does not sell your personal information for money. However, we may share your PI with third parties and service providers for the purposes described in this Privacy Policy.

The Company does not offer financial incentives for the use of personal information.

YOUR RIGHTS AND CHOICES

You may have certain rights and choices regarding our processing of your PI. Depending on your jurisdiction, applicable law may entitle you to additional consumer rights, including the right:

- To know the categories and/or specific pieces of PI collected about you, the categories of sources from which the PI is collected, the business or commercial purpose for collecting or selling PI, and the categories of third parties with whom your PI was shared;
- To request deletion of your PI;
- To opt-out of the sale of PI, to the extent this is applicable to your PI; and
- To non-discrimination based on the exercise of a consumer's privacy rights.

Please note that a large portion of the PI collected and processed by us will be out of scope for certain individual rights as it falls under exemptions for information collected under applicable federal laws.

EXERCISING YOUR RIGHTS

To exercise your rights, please contact us using the methods provided in the [CONTACT INFORMATION](#) section at the end of this Privacy Policy to obtain the verification form and submit your request. Because we take the protection of your PI seriously, in order to process this request, your identity must be verified. We reserve the right to verify your identity in connection with any requests regarding PI to help ensure that we provide the information we maintain to the individuals to whom it pertains, and allow only those individuals or their authorized representatives to exercise rights with respect to that information. If you are an authorized agent making a request on behalf of a consumer, we may require and request additional information to verify that you are authorized to make that request.

For example, for certain requests, we will ask you to complete an Affidavit of Identity to verify your identity and ask the affidavit to be notarized.

We reserve the right to deny your request if we cannot verify your identity. Where we deny your request in whole or in part, we will inform you of the denial, provide an explanation of our actions, and the reason(s) for the denial.

We will not restrict or deny you access to our services because of choices and requests you make in connection with your personal information. We will promptly respond to all applicable requests.

SECURITY AND PROTECTION OF PERSONAL INFORMATION

We have put in place reasonable and appropriate technical and information safety safeguards designed to protect against unauthorized or unlawful processing of PI and against accidental loss, destruction or damage to PI. This includes measures such as computer safeguards and securing files and buildings. While it is our practice to take reasonable steps to secure PI, the confidentiality of information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting PI over the Internet, especially PI related to your financial information.

CHILDREN AND MINORS

The Company does not direct services to individuals under the age of sixteen (16) and we do not and will not sell the PI of minors under 16 years of age absent affirmative authorization. If you are under age 16, please do not submit PI to us. If you are a parent and become aware that your child has provided us with information, please contact us using one of the methods provided in the [CONTACT INFORMATION](#) section at the end of this Privacy

Policy and we will work with you to address this issue. If you submit any PI belonging to a minor as a party to a claim, we will assume you have granted authorization for us to use and share the PI as described in this Policy.

COOKIES AND INTERNET TRACKING

We may collect cookies when you access our website. A cookie is a bit of information that a website sends to your Web browser that helps the site remember information about you and your preferences. In addition, the system may automatically log your IP address and type of browser used, and this information may be used for data security purposes and reviewed in the case of a security incident.

When you use our website, some browsers have Do Not Track (“DNT”) features that allow you to tell a website not to track you. The Company does not honor the AdChoice DNT signals. Please be aware that limiting the ability of website technologies may limit your experience and in some cases parts of the website may not work.

CHANGES TO OUR PRIVACY POLICY

The Company reserves the right to amend this Privacy Policy at our discretion and at any time. When we make changes, we will post the updated notice on the Website and update the Privacy Policy effective date. We review this annually and if we determine that no revisions are required, in addition to the effective date, we will post the last date a review was completed. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

CONTACT INFORMATION

If you have any questions or comments about this Privacy Policy, the ways in which the listed Companies below collect and use your information described in this Privacy Policy, your choices and rights regarding such use, or wish to exercise any of your rights, please do not hesitate to contact us using the methods provided below.

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| “Company” |
| Alea North America Insurance Company |
| Catalina U.S. Insurance Services LLC |
| Danielson National Insurance Company |
| National American Insurance Company Of California |
| National Home Insurance Company (A Risk Retention Group) |
| ProBuilders Specialty Insurance Company, a RRG |
| SPARTA Insurance Company |
| Other companies where CUSIS has entered into a service agreement to manage claim activity for an insurance company or an insurance product that has been discontinued and CUSIS is responsible within such service agreement for the collection, maintenance, and security of your personal information. |

Contact Information For All Companies:

You may contact us by telephone, email or through our website or postal address.

Toll-free Phone: (877) 772-7824

Email: MyinformationRequest@Catalinare.com

Website: <http://cusis.catalinare.com>

Postal Address:

Catalina U.S. Insurance Services LLC
5 Batterson Park Road, 3rd Floor
Farmington, CT 06032
Attn: U.S. Compliance Officer

GLBA PRIVACY NOTICE

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| FACTS | WHAT DOES CATALINA U.S. INSURANCE SERVICES LLC DO WITH YOUR PERSONAL INFORMATION? |
| Why? | Insurance companies, like other financial companies, choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. |
| What? | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number • Income • Account balances • Payment history • Credit history • Credit scores <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> |
| How? | Insurance companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons insurance companies can share their customers' personal information, the reasons Catalina U.S. Insurance Services LLC chooses to share, and whether you can limit this sharing. |

| Reasons we can share your personal information | Does Catalina U.S. Insurance Services LLC share? | Can you limit this sharing? |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|------------------------------------|
| For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| For our marketing purposes - to offer our products and services to you | Yes | We do not share |
| For joint marketing with other insurance/financial companies | Yes | We do not share |
| For our affiliates' everyday business purposes - information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes - information about your creditworthiness | No | We do not share |
| For our affiliates to market to you | No | We do not share |
| For nonaffiliates to market to you | No | We do not share |

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| Questions? | Call toll-free 1877-772-7824 or go to http://cuisis.catalinare.com |
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| Who We Are | |
|-------------------------------|-------------------------------------------------------------------------|
| Who is providing this notice? | You are receiving this notice from Catalina U.S. Insurance Services LLC |

| What We Do | |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| How does Catalina U.S. Insurance Services LLC protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. |
| How does Catalina U.S. Insurance Services LLC collect my personal information? | <p>We collect your personal information, for example, when:</p> <ul style="list-style-type: none"> • You apply for an insurance policy • You settle a claim • You need to have property covered under the claim repaired • We process and service your policy • We provide information to your medical provider in order to process your claim <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p> |
| Why can't I limit all sharing? | <p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness • Affiliates from using your information to market to you • Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> |

| Definitions | |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Affiliates | <p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <p><i>Our affiliates are</i></p> <ul style="list-style-type: none"> • <i>Alea North America Insurance Company</i> • <i>Catalina U.S. Insurance Services LLC</i> • <i>Danielson National Insurance Company</i> • <i>National American Insurance Company Of California</i> • <i>National Home Insurance Company (A Risk Retention Group)</i> • <i>ProBuilders Specialty Insurance Company, a RRG</i> • <i>SPARTA Insurance Company</i> |
| Nonaffiliates | <p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> • <i>Catalina U.S. Insurance Services LLC does not share with nonaffiliates so they can market to you.</i> |

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| Joint Marketing | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>We do not conduct any joint marketing</i> |
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Other Important Information

State Laws:

Vermont: We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

For Nevada Residents Only: We are providing you this notice pursuant to state law. If you prefer not to receive direct marketing calls from us, you may be placed on our Internal Do Not Call List by calling the number provided in the *Questions section*. Nevada law requires we provide the following contact information: Bureau of the Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; telephone number: 1-702-486-3132; email aginfo@ag.nv.gov.

California: Under California law, we will not share information we collect about you with companies outside of Catalina U.S. Insurance Services LLC or our affiliates, unless the law allows. We will limit sharing to the extent required by California law. California residents can review the Privacy Policy above for any additional rights. .