# Savvi Insurance Group, Inc. California Consumer Privacy Act Notice

We value your privacy.

We value your privacy. Our policy is to protect the confidentiality of the individually identifiable information that we collect, and to limit access to that information only to those with a need to know. This privacy statement addresses our privacy practices including the collection and use of personal information in offline, online and mobile environments. Specific information regarding online and mobile privacy provisions may also be found in this privacy statement.

### **Collection and Use of Personal Information**

We may collect the following categories of personal information for the purposes identified below. Please note that the examples are not an exhaustive list and may fall into multiple categories. Categories and specific pieces of information collected may vary depending on the nature of your relationship with us.

Category	Purpose of Use	What may be included in this category	Some examples
Internal	Authenticate your identity; create, maintain and secure your account with us; maintain your preferences.	Knowledge and Belief, Authenticating, Preference	Passwords, PIN, mother's maiden name, individual interests
Historical	Complete a transaction or provide a service for which the personal information was collected; conduct analytics and modeling.	Personal history	Past claims, prior insurance carriers, prior addresses, medical history, criminal history
Financial	Process your billing; make payments; complete a transaction or provide a service for which the personal information was collected.	Account, Ownership, Transactional, Credit	Credit card number, bank account, records of real or personal property, credit, income, loan records, taxes

Category	Purpose of Use	What may be included in this category	Some examples
External	Identify information to verify you; complete a transaction or provide a service for which the personal information was collected; deliver product offerings that may be relevant to you; conduct analytics.	Identifying, Ethnicity, Gender, Demographic, Medical and Health, Physical Characteristics	Name, username, government issued identification, social security number, gender, browsing behavior, age range, income bracket, physical and mental health, medical records
Social	Establish your communication preferences; complete a transaction or provide a service for which the personal information was collected; process your policy, account or claim.	Professional, Criminal, Public Life, Family, Social Network, Communication	Job titles, work history, school attended, convictions, charges, marital and family status, email, telephone recordings
Tracking	Contact you; provide relevant information; provide a location-based product or service requested by you; conduct analytics.	Computer or Mobile Device, Contact, Location	IP Address, geolocation, email address, physical address, telephone number, country

# Do Not Sell My Personal Information/Notice of Right to Opt Out

Under the California Consumer Privacy Act ("CCPA"), the sale of your personal information means the sharing of your personal information with certain third parties. Under CCPA, consumers have the right to direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information. Currently, we do not share your personal information in a manner that would be considered a sale under CCPA. We only disclose your personal information to our service providers pursuant to contracts that prohibit the service provider from using your personal information for any purpose other than those services specified in the contract. If, in the future, we share your information in a manner that will be considered a sale under CCPA, this privacy notice will be updated.

Although we do not currently share personal information in a manner that would be considered a sale under CCPA, you may still submit a request to opt out. You may do so through either of the following methods:

- 1. Dial 1-844-767-2884 Monday to Friday from 9 a.m. to 5 p.m. Eastern Time. The representative will collect information from you for verification and to initiate your request.
- 2. Submit a request through our CCPA Request Form. Within three to five business days of receipt of your request, a representative will call you at the number you provide in order to collect any additional information from you necessary for verification and to initiate your request.

You may also designate another person or business entity registered with the Secretary of State ("Authorized Agent") to act on your behalf with regard to the right to opt-out. You must provide the Authorized Agent written permission to do so. One way to do so is to provide us with a notarized affidavit. A sample affidavit is available for download from the CCPA Request Form.

## **Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

Directly from you	We collect personal information when you provide it to us in a request for a quote, claim, or policy on any of our website(s) or mobile applications or through interactions with an agent or our call center.	
Indirectly from you	We may collect personal information including, but not limited to geolocation and driving data (when using mobile applications), IP address, cookies and device ID when you visit our website(s), interact with our online advertisements or use our mobile application(s).	
Provided by third-party service providers	We may collect personal information from our third-party service providers.	
Obtained from government entities	We may obtain personal information from public records maintained by various government entities.	

# **Sharing Personal Information**

We may disclose your personal information, for a business purpose, to a third-party service provider. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We share your personal information with the following categories of third parties:

Service providers which may include, but are not limited to:

- Internet service providers
- Data analytics providers
- Government entities
- Consumer reporting agencies
- Insurance support organizations

In the previous twelve (12) months, we may have disclosed the following categories of personal information for a business purpose: internal, historical, financial, external, social and tracking.

In the previous twelve (12) months, we have not sold your personal information as that term is defined by the CCPA.

# **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.

#### Right to Access/Right to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. You may request to know only the categories of personal information or the specific pieces of personal information we collected about you. Once we receive and confirm your verifiable consumer request we will disclose to you (as applicable to your request):

- 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 which we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - o sales, identifying the personal information categories that each category of recipient purchased; and
  - o disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

You may only make a verifiable consumer request for access twice within a 12-month period.

# **Right to Request Deletion**

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

# **Exercising Access and Deletion Rights**

To exercise the access or deletion rights described above, a verifiable consumer request can be made to us by either:

- 1. Dial 1-844-767-2884 Monday to Friday from 9 a.m. to 5 p.m. Eastern Time. The representative will collect information from you for verification and to initiate your request.
- 2. Submit a request through our CCPA Request Form. Within three to five business days of receipt of your request, a representative will call you at the number you provide in order to collect any additional information from you necessary for verification and to initiate your request.

Additional information will be required for verification purposes. The specific elements may vary depending on the nature of your relationship with us but will begin with name, address, phone number and date of birth. These elements will be matched with data in our systems. Only you, or an authorized agent, may make a request related to your personal information. You may also make a request on behalf of your minor child.

If you designate an Authorized Agent to act on your behalf with regard to a request to know or delete, you must
provide us with a notarized affidavit. A sample affidavit is available for download from the CCPA Request
Form. Alternatively, a valid power of attorney may be provided. Responses to requests for access will be provided
directly to the consumer.

You may make a request to know the categories of information or specific pieces of information. For requests that
seek the disclosure of specific pieces information, you may 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. A sample declaration is
available for download from the CCPA Request Form.

If we are unable to verify you based on the information you have provided and the information in our systems, we will advise you that we cannot complete your request based on an inability to verify you.

#### Request to Opt-In

If you would like to opt in after opting out of the sale of personal information, you may do so through either of the following methods:

- 1. Dial 1-844-767-2884 Monday to Friday from 9 a.m. to 5 p.m. Eastern Time. The representative will collect information from you for verification and to initiate your request.
- 2. Submit a request through our CCPA Request Form. Within three to five business days of receipt of your request, a representative will call you at the number you provide in order to collect any additional information from you necessary for verification and to initiate your request.

Additionally, we do not and will not share the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. However, if you are the parent or guardian of a consumer who is a minor under 13 years of age, you may opt-in for the sale of the minor's information by providing a consent form to us that is signed under penalty of perjury. A sample form can be found on the CCPA Request Form. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

#### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail.

Disclosures we provide may 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.

#### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights.

## **Contact for More Information**

If you have additional questions related to our privacy policies and practices, please contact us at 1-844-767-2884 Monday to Friday from 9 a.m. to 5 p.m. Eastern Time.

# **Hyperlinks/Third-Party Sites and Services**

We have agreements with third parties that allow you to go to their website or mobile application from our websites and/or mobile applications. If you go to these sites from our site, you may be asked to give non-public personal information for access to their services or products. You may become a part of that business' customer base and be subject to their policies regarding the handling of customer data.

Please be aware that we are not responsible for the privacy practices of those sites or applications, even though our name or logo may appear on those sites and applications. We encourage you to be aware of this when you leave our site and to read the privacy statements of each and every website and mobile application that you visit, as the privacy policy of those sites may differ from ours. Our privacy statement applies solely to our websites and applications.

## Security

Our policy is to restrict access to nonpublic personal information about you only to those employees who need to know that information to provide products or services to you or to provide necessary technical support. We require the employees with access to your nonpublic personal information, including your social security numbers, to use safeguards against unauthorized access, use and unlawful disclosure. We require our employees to adhere to high standards of ethics and integrity in performing their jobs and conducting business. When you are on any website that asks you for confidential information, you should check to see if the information being transmitted is encrypted in order to increase the security of your information.

# Logging

In addition to the information you provide us, we collect information about your activities while you are at our site. While you are logged in our site, we may log IP addresses (a number assigned to your computer when you use the Internet), browser and platform types, domain names, access times, referral data (the last site or URL you visited before logging into our site and the first site or URL you visit after leaving our site), and your activity while using or reviewing our site.

#### **Push Notifications**

You can choose whether or not to receive mobile push notifications from us. If you subsequently change your mind, you can use your mobile device's settings functionality to modify your preferences.

#### **Interest-based ads**

Interest-based ads are online ads tailored to your likely interests based on your use of various apps and websites across the Internet. If you are using a browser, then cookies and web beacons can be used to collect information to help determine your likely interests. If you are using a mobile device, tablet, or streaming media device that includes an advertising identifier, then that identifier can be used to help determine your likely interests. For your choices about interest-based ads from us, please see the Cookies section (below).

#### **Cookies**

A cookie is a message sent to your browser from a web server that is stored on your computer's hard drive. The message is sent back to the web server whenever the browser requests a page from that server. Many commercial Internet sites use cookies. While a code in the cookie file enables the site to label you as a particular user, it does not identify you by name or address unless you have provided the site with such information or set up preferences in your browser to do so automatically. You may opt out of accepting cookies by changing the settings on your browser. However, rejecting cookies may prevent you from using certain functions and you may have to repeatedly enter information to take advantage of services or promotions. In general, cookies allow us to identify you as a particular user and thus provide you with a more customized service. We may also use cookies to track customer or user requests, inquiries and traffic patterns or to determine audience size and repeated usage. We use web beacons (also known as pixel tags, or transparent GIF files), to help manage online advertising. These files enable us to recognize a unique cookie on your web browser, which in turn enables us to learn which advertisements bring users to our website. With both cookies and other technologies to measure online advertising, the information that we collect and share is anonymous and not personally identifiable. It does not contain your name, address, telephone number, or email address.

We do not currently support Do Not Track signals but may in the future.

When you visit our website, other parties may collect personally identifiable information about your online activities over time and across different websites. Notwithstanding any other provision, we may work with a third party partner who may collect information from you, such as your IP address and information about your browser or operating system, and may place or recognize a unique cookie on your browser for the purpose of enabling interest-based content or advertising to you. The cookies placed by our third party partners contain no personally identifiable information; they may contain demographic or other interest-based data in a de-identified form. The information in these cookies may be

linked to data you voluntarily have submitted to us, such as your name, postal address or email, which we may share in hashed or encrypted form. To opt-out of these data provider cookies, please go to <a href="http://www.aboutads.info/choices">http://www.aboutads.info/choices</a>.

#### **Location-Based Services**

To provide location-based services on certain products, we and our service providers may collect, use, and share precise location data, including the real-time geographic location of your mobile device. Where available, location-based services may use GPS, Bluetooth, and IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you and is used by us and our service providers to provide and improve location-based products and services.

# **Legal Terms**

We also recommend you read the applicable terms and conditions for use on our websites and mobile applications that address the content in our sites and information about your responsibilities when using these sites.

#### **Children and Minors**

We make no active effort to collect personal information from children and do not wish to receive any such information. If we learn that we have collected the personal information of a child under 18, we will take steps to delete the information as soon as possible.

# **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. We encourage you to periodically review this notice to be informed of how Savvi Insurance Group, Inc. is protecting your information. When we make changes to this privacy notice, we will post the updated notice on our websites and in our mobile applications and update the notice's effective date. Your continued use of our website(s) and mobile applications following the posting of changes constitutes your acceptance of such changes.

Effective Date: June 15, 2021