

# Privacy Notice for California Residents

(Effective July 1, 2023)

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (collectively, the “CCPA”) gives California residents certain privacy rights with respect to some of the personal information Clear Spring Property and Casualty Company (“Clear Spring Insurance,” “we,” “us” or “our”) may collect about you. We have adopted this California Privacy Notice (“Privacy Notice”) in accordance with the notice requirements under the CCPA. Any terms defined in the CCPA have the same meaning when used in this Privacy Notice. This Privacy Notice does not apply to information we collect pursuant to the Gramm-Leach-Bliley Act.

This Privacy Notice applies only to information collected through the following websites we own: <https://p.clearspringpc.com>.

## Definitions Specific to this Privacy Notice

The CCPA includes definitions for terms specific to this Privacy Notice that do not apply to our primary Privacy Policy, including the following terms:

*“Personal Information”* means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include publicly available information obtained from government records; deidentified or aggregated consumer information that cannot be reconstructed to identify you; any information covered under the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act, activities covered by the Fair Credit Reporting Act, or protected health information as defined under the Health Insurance Portability and Accountability Act. Personal Information also includes “Sensitive Personal Information,” as defined below, except where otherwise noted.

*“Sale”* or *“sell”* means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a Third Party for monetary or other valuable consideration.

*“Share”* or *“sharing”* means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information by the business to a Third Party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a Third Party for cross-



context behavioral advertising for the benefit of a business in which no money is exchanged.

*"Sensitive Personal Information"* means Personal Information that reveals a consumer's Social Security number, driver's license, state identification card, or passport number; account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious beliefs, or union membership; contents of email or text messages; and genetic data. Sensitive Personal Information also includes Processing of biometric information for the purpose of uniquely identifying a consumer and Personal Information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.

*"Service Provider"* means a sole proprietorship, partnership, limited liability company, corporation, association, or other legal entity that is organized or operated for the profit or financial benefit of its shareholders or other owners, that processes information on behalf of a business and to which the business discloses a consumer's Personal Information for a business purpose pursuant to a written contract.

*"Third Party"* means a person or entity who is not any of the following:

1. The business with whom the consumer intentionally interacts and that collects personal information from the consumer as part of the consumer's current interaction with the business under this title.
2. A Service Provider to the business.
3. A Contractor.

*"Vendor"* means a Service Provider, contractor, or processor as those terms are defined in the CCPA.

To the extent other terms used in this Privacy Notice are defined terms under the CCPA, they shall have the meanings afforded to them in that statute, whether or not capitalized, herein.

### **Collection and Processing of Personal Information**

We, and our Vendors, collect the following categories of Personal Information about our consumers. The categories of Personal Information we collect about a specific consumer will depend on our relationship or interactions with such consumer. We also have collected or Processed the following categories of Personal Information about consumers in the preceding 12 months:

1. Identifiers, such as name, alias, online identifiers, account name, physical characteristics or description;
2. Contact and financial information, including phone number, address, email address, financial information, medical information, health insurance information;
3. Characteristics of protected classifications under state or federal law,

such as age, gender, race, physical or mental health conditions, and marital status;

4. Biometric information (such as your fingerprint and photos for facial recognition or your voiceprint);
5. Commercial information, such as transaction information and purchase history;
6. Internet or other electronic network activity information, such as browsing history and interactions with our websites or advertisements;
7. Geolocation;
8. Audio, electronic, visual and similar information, such as call and video recordings;
9. Professional or employment-related information, such as work history and prior employer;
10. Education information, as defined in the federal Family Educational Rights and Privacy Act, such as student records and directory information; and
11. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

### **Data Retention**

We retain Personal Information no longer than necessary to fulfill the purposes described in this Privacy Notice, and to comply with applicable laws and regulations. We consider the following criteria when determining how long to retain Personal Information: why we collected the Personal Information; the nature of the Personal Information; the sensitivity of the Personal Information; our legal obligations related to the Personal Information; and the risks associated with retaining the Personal Information.

### **Purposes for Processing Personal Information**

The purposes for which we collect, Process or disclose Personal Information is based on our relationship with you and the interactions you have with us. We, and our Vendors, collect, Process, or disclose Personal Information (excluding Sensitive Personal Information) to:

- Operate, manage, and maintain our business;
- Provide, develop, improve, repair, and maintain our products and services;
- Personalize, advertise, and market our products and services;
- Conduct research, analytics, and data analysis;
- Maintain our facilities and infrastructure;
- Undertake quality and safety assurance measures;
- Conduct risk and security controls and monitoring;

- Detect and prevent fraud;
- Perform identity verification;
- Perform accounting, audit, and other internal functions, such as internal investigations;
- Comply with law, legal process, and internal policies;
- Receive and respond to inquiries;
- Maintain records;
- Exercise and defend legal claims; and
- Otherwise accomplish our business purposes and objectives.

We, and our Vendors, do not collect or Process Sensitive Personal Information.

We do not sell or share and have not sold or shared Personal Information about California consumers in the past twelve months. Relatedly, we do not have actual knowledge that we sell or share Personal Information of California consumers who are under 16 years of age.

#### **Categories of Personal Information We Disclose to Vendors & Third Parties**

1. Identifiers, such as name, alias, online identifiers, account name, physical characteristics or description;
2. Contact and financial information, including phone number, address, email address, financial information, medical information, health insurance information;
3. Characteristics of protected classifications under state or federal law, such as age, gender, race, physical or mental health conditions, and marital status;
4. Biometric information (such as your fingerprint and photos for facial recognition or your voiceprint);
5. Commercial information, such as transaction information and purchase history;
6. Internet or other electronic network activity information, such as browsing history and interactions with our websites or advertisements;
7. Geolocation;
8. Audio, electronic, visual and similar information, such as call and video recordings;
9. Professional or employment-related information, such as work history and prior employer;
10. Education information, as defined in the federal Family Educational Rights and Privacy Act, such as student records and directory information; and
11. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's

preferences and characteristics.

### **Sources from Which We Collect Personal Information**

We collect Personal Information directly from consumers, as well as from joint marketing partners, public databases, providers of demographic data, publications, professional organizations, social media platforms, and Vendors and Third Parties when they disclose Personal Information to us based on your interactions with them.

### **Categories of Entities to Whom We Disclose Personal Information**

- **Affiliates & Vendors.** We disclose the categories of Personal Information listed in this Privacy Notice to our affiliates and Vendors for the purposes described in this Privacy Notice. Our Vendors provide us with services for our websites, as well as other products and services, such as web hosting, data analysis, payment processing, order fulfillment, customer service, infrastructure provision, technology services, email delivery services, credit card processing, legal services, and other similar services. We grant our Vendors access to Personal Information only to the extent needed for them to perform their functions, and we require them to protect the confidentiality and security of such information.
- **Third Parties.** We may also disclose the categories of Personal Information listed in this Privacy Notice to the following categories of Third Parties:
  - **At Your Direction.** We may disclose your Personal Information to any Third Party with your consent or at your direction.
  - **Business Transfers or Assignments.** We may disclose your Personal Information to other entities as reasonably necessary to facilitate a merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
  - **Legal and Regulatory.** We may disclose your Personal Information to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law.

### **California Resident Data Rights Requests**

Consumers who live in California have certain rights with respect to the collection and use of their Personal Information. You may access these data rights by calling (866) 702-6998, by emailing us at [privacy@clearspringpc.com](mailto:privacy@clearspringpc.com) or by clicking [here](#) and submitting details regarding your request.

## Verification

We may ask you to provide information that will enable us to verify your identity in order to comply with your request. Further, when a consumer authorizes an agent to make a request on their behalf, we may require the agent to provide proof of signed permission from the consumer to submit the request, or we may require the consumer to verify their own identity to us or confirm with us that they provided the agent with permission to submit the request. Please note that there are circumstances in which we may not be able to comply with your request pursuant to the CCPA, including when we cannot verify your request and/or when there is a conflict with our own obligations to comply with other legal or regulatory requirements. Additionally, in certain instances, some information we collect from you may be excluded from the definition of Personal Information as defined under the CCPA, as it is protected by the Gramm-Leach-Bliley Act, and as such, this information is exempt from certain rights otherwise available to you under the CCPA. We will respond to your request consistent with applicable law.

## Data Rights

You have the following rights regarding our collection and use of your Personal Information, subject to certain exceptions.

1. **Right to Receive Information on Privacy Practices:** you have the right to receive the following information at or before the point of collection:
  - a. The categories of Personal Information to be collected;
  - b. The purposes for which the categories of Personal Information are collected or used;
  - c. Whether or not that Personal Information is sold or shared;
  - d. If the business collects Sensitive Personal Information, the categories of Sensitive Personal Information to be collected, the purposes for which it is collected or used, and whether that information is sold or shared; and
  - e. The length of time the business intends to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period.

We have provided this information in this Privacy Notice, and you may request further information about our privacy practices by contacting us at the contact information provided in this Privacy Notice.

2. **Right to Deletion:** You may request that we delete any Personal Information about you we that we collected from you.
3. **Right to Correction:** You may request that we correct any inaccurate Personal Information we maintain about you.
4. **Right to Know:** You may request that we provide you with

information about what Personal Information we have collected about you, including:

- a. The categories of Personal Information we have collected about you;
- b. The categories of sources from which we collected such Personal Information;
- c. The business or commercial purpose for collecting, selling, or sharing Personal Information about you;
- d. The categories of Third Parties to whom we disclose such Personal Information; and
- e. The specific pieces of Personal Information we have collected about you.

**5. Right to Receive Information About Onward Disclosures:**

You may request that we disclose to you:

- a. The categories of Personal Information that we have collected about you;
- b. The categories of Personal Information that we have sold or shared about you and the categories of Third Parties to whom the Personal Information was sold or shared; and
- c. The categories of Personal Information we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

**6. Right to Non-Discrimination:** You have the right not to be discriminated against for exercising your data rights. We will not discriminate against you for exercising your data rights.

**Sale and Sharing of Your Personal Information and Use of Your Sensitive**

**Personal Information:** We do not sell or share and have not sold or shared Personal Information of California consumers in the past twelve months. Further, we do not use Sensitive Personal Information for purposes beyond those authorized by the CCPA, and we have not used Sensitive Personal Information of California consumers in the preceding twelve months for purposes beyond those authorized by the CCPA. Because we do not sell or share Personal Information or use or disclose Sensitive Personal Information for purposes other than those authorized by the CCPA, we do not process opt-out preference signals of California consumers. If we ever do sell or share Personal Information of California consumers or use Sensitive Personal Information for purposes beyond those authorized by the CCPA, we will provide you with the right to opt-out of the sale and sharing of your Personal Information or limit the use of your Sensitive Personal Information to the purposes authorized by the CCPA, as applicable.

**California Residents Under 18.** If you are a resident of California under the age of 18 and a registered user of our website, you may ask us to remove content or data that you have posted to the website by writing to [privacy@clearspringpc.com](mailto:privacy@clearspringpc.com). Please note that your request does not ensure

complete or comprehensive removal of the content or data as, for example, some of your content or data may have been reposted by another user.

**Disclosure About Direct Marketing.** California Civil Code § 1798.83 permits California residents to annually request certain information regarding our disclosure of Personal Information to other entities for their direct marketing purposes in the preceding calendar year. We do not distribute your Personal Information to other entities for their own direct marketing purposes.

**Financial Incentives for California Consumers.** We do not provide financial incentives to California consumers who allow us to collect, retain, sell, or share their Personal Information. We will describe such programs to you if and when we offer them to you.

**Changes to our Supplemental Notice.** We reserve the right to amend this Privacy Notice in our discretion and at any time. When we make material changes to this Privacy Notice, we will notify you by posting an updated Privacy Notice on our website and listing the effective date of such updates.

**Contacting Us.** If you have any questions, comments, requests, or concerns related to this Privacy Notice, Clear Spring Insurance's information practices, or how to access this Privacy Notice in another format, please contact us by mail at 10555 Group 1001 Way, Zionsville, IN 46077, by email at [privacy@clearspringpc.com](mailto:privacy@clearspringpc.com), or by calling 1-866-702-6998.

**Click here to be taken to the webform:** [www.clearspringpc.com/ccpa.html](http://www.clearspringpc.com/ccpa.html)