

Important Notice About Our Information Practices And The Protection Of Your Privacy
Pacific Coastal General Insurance Agency
(Data Controller and Processor)

RESPECTING YOUR RIGHT TO PRIVACY PURSUANT TO CALIFORNIA CONSUMER PRIVACY ACT OF 2018

We value your business and the trust you've placed with us. That's why we want to assure you that we are serious about keeping your personal information private before, during and after your business relationship with us. This notice, in addition to our Respecting Your Right to Privacy, describes our policy regarding the collection, disclosure and protection of your non-public personal information obtained during the underwriting process, pursuant to California Consumer Privacy Act of 2018, as may be amended from time to time, ("CCPA") and other California privacy laws. This notice applies solely to insureds residing in California. Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect. It is necessary to collect information about you and/or other persons proposed for insurance during the underwriting process for the purpose of providing insurance, including underwriting (which may include underwriting decisions made via automated means) and handling claims, and any other related purposes.

The categories of information that most closely describe the personal information we have collected about you or other persons proposed for insurance in the preceding twelve (12) months include:

Category	Examples (Note: We do not collect all information specified in the below examples of each category.)	Collected
(A) 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.	Yes
(B) Any categories of personal information described in the California Customer Records statute (Section 1798.80(e) of the Cal. Civ. Code).	Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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.	Yes
(C) Characteristics of protected classifications under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
(D) Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
(E) Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
(F) Internet or other electronic network activity information.	Browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.	No

(G) Geolocation data.	Physical location or movements.	Yes
(H) Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
(I) Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
(J) Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 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, student financial information, or student disciplinary records.	No
(K) Inferences drawn from other personal information.	Profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

Personal Information does not include:

- Publicly available information that is lawfully made available from federal, state, or local government records;
- Consumer information that is deidentified or aggregate consumer information;
- Information excluded from the CCPA's scope, such as:
 - Medical or health information governed by the California Confidentiality of Medical Information Act (CMIA), Health Insurance Portability and Accountability Act of 1996 (HIPPA), and the Health Information Technology for Economic and Clinical Health Act (HITECH Act);
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act ("FCRA), the Gramm-Leach Bliley Act (GLBA), or the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

We obtain most of our information directly from you. Depending on the nature of your insurance transaction, we may also collect information about you or other individuals proposed for insurance from the following categories of other sources:

- Directly or indirectly from you or your insurance producer or broker, or your representative as part of your application for insurance or contained in other insurance forms;
- Directly and indirectly from activity on our website; and
- From third-parties that interact with us in connection with the services we perform, such as other insurance producers, brokers, administrators, investigators, insurance support organizations, consumer reporting agencies, and government reporting agencies.

The information received from these sources may include inspections and investigative reports, audits, consumer reports, driving records, asset information, insurance underwriting records and records relating to prior insurance.

Some of the personal information, such as information relating to health or criminal convictions, may be required by us for the specific purposes of underwriting or as part of the claims handling process. The provision of such data is necessary for us to be able to provide you with insurance or manage a claim. Such data will only be used for the specific purposes set out in our notice.

Use Of Personal Information. We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided;
- To provide you with information, products, or services that you request from us;
- To provide you with email alerts and other notices concerning our products or services, or events or news, that may be of interest to you;

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections;
- To improve our website and present its contents to you;
- For testing, research, analysis and product development;
- As necessary or appropriate to protect the rights, property, or safety of us, our clients or others;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- As described to you when collecting your personal information or as otherwise set forth in the CCPA; and
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We 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.

Information We May Disclose To Affiliates And Third Parties. We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law and required by contract for a business purpose. 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 may disclose some or all of the nonpublic personal information described above that we collect about you to:

- Claims administrators;
- Insurance producers or brokers;
- Appraisers, Inspectors, and other insurance support services;
- Consumer reporting agencies;
- Governmental agencies when required to do so;
- The underwriting company(ies) that may be evaluating, pricing, issuing, maintaining and applying any policy of insurance that applies to you, including any claims related thereto;
- An affiliate or third party for the purpose of conducting an audit of the insurance institution or insurance producer or broker in connection with the operations or services provided;
- To a lienholder, mortgagee, assignee, or other person having a legal or beneficial interest in the policy of insurance;
- To persons or agencies lawfully entitled to such information pursuant to a facially valid subpoena or court order;
- Legal counsel; and
- Outside professional data services.

Information obtained from a report prepared by an insurance support organization may be retained by the insurance support organization and disclosed to other persons. Personal information and other privileged information collected by us or your insurance producer or broker may in certain circumstances be disclosed to third parties without your authorization, as permitted or required by law. If you are a resident of the European Union, your personal data may be transferred to destinations outside the European Economic Area (“EEA”) and we ensure that it is treated securely and in accordance with the applicable law.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category (A) Identifiers;
- Category (B) Any categories of personal information described in the California Customer Records statute (Section 1798.80(e) of the Cal. Civ. Code).
- Category (C) Characteristics of protected classifications under California or federal law.
- Category (D) Commercial information;
- Category (G) Geolocation data; and
- Category (I) Professional or employment-related information.

Note: We do not collect all information specified in the aforementioned examples of each category.

In the preceding twelve (12) months, we have not sold any personal information.

Our Practices Regarding Use Of Your Personal Information For Marketing Purposes. We do not share your financial information with our affiliates to market products or services to you. We do not sell your personal information to anyone. Nor do we share it with entities or organizations outside of our company that would use that information to contact you about their own products and services. Should our practice ever change, we will offer you the ability to prohibit this type of information sharing and would offer you the opportunity to opt-out of this type of information sharing, and we would offer you the opt-out with time for you to respond before the change in our practice takes place.

Our Practices Regarding Information Confidentiality And Security. We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you. We also maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information and appropriate technical and organisational measures to protect against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to nonpublic personal information. A more detailed description of our information practices and your right to privacy is available to you by submitting a request in writing to us at the address indicated below.

Our Practices Regarding Information Retention. Your data will be retained and managed in accordance with our data retention policy. The retention period depends on the type of data on file and may be extended if we are required to retain the data for a longer period due to business, legal or regulatory requirements.

Your Rights Under the CCPA. 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.

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the preceding twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

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

You have the right to request that we delete any of your personal information that we collected from you 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.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- 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 businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent;
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business;
- Comply with a legal obligation; or
- Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, 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 will not discriminate against you because you exercised any of your rights under the California Consumer Privacy Act of 2018, including, but not limited to, by: (a) denying goods or services to you; (b) charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (c) providing a different level or quality of goods or services to you; and (d) suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Access To, Correction Of, And Deletion Of Your Information. You can notify us in writing if you believe any information should be corrected, amended, or deleted and we will review your request. We will either make the requested change or explain why we did not do so. If we do not make the requested change, you may submit a short written statement identifying the disputed information, which will be included in all future disclosures of your information.

To exercise the access, data portability, correction and deletion rights described above, please submit a verifiable consumer request to us by e-mailing or sending your written request to us at privacy@cabgen.com or P.O. Box 357965, Gainesville, FL 32635, Attn: Privacy Coordinator or Chief Technology Officer/Data Protection Officer; calling us with your request on 866-896-7233; or visiting www.cabgen.com. You may only make a verifiable consumer request for access or data portability twice within a twelve (12)-month period. The verifiable consumer requests must include your name; address; telephone number; policy number; a photocopy of a picture ID for identification purposes, if the request is written; sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to 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. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 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 twelve (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.

Consent To Fair Use. You, a party to any insurance policy(ies) offered by us, hereby give consent to us and our agents and representatives to receive, hold, record, store, and process your information in the business of insuring your property interests. You may withdraw consent at any time, except when legal action is pending on the policy or policies, or when withdrawal of consent would adversely prevent us from fulfilling our obligations in service of the policy or policies. Should you withdraw consent during the in-force term of your policy(ies), then all such policies would be cancelled at the post-marked date of your withdrawal at midnight of that day in local US Eastern time. Additionally, you have the right to have your data deleted under certain circumstances specified in applicable law, to restrict the processing of your data, and to lodge a complaint with the local supervisory authority.

Changes to Our Privacy Notice. We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage. This privacy notice was last updated on December 18, 2019.