

CALIFORNIA PRIVACY NOTICE

Effective Date: January 1, 2020

Last Reviewed on: December 10, 2019

1. Protecting Your Information

MAPFRE Insurance has always made it a priority to protect your personal and privileged information. We do not sell your information. We limit access to your personal and privileged information to those persons who need to know it to perform their jobs and to provide service to you, and as required or permitted by law. We maintain physical and electronic safeguards to protect such information from unauthorized use or disclosure.

You may have additional concerns about the privacy and security of information collected through our web site. We are committed to protecting the online privacy of visitors to our web site. We maintain physical, electronic, and procedural safeguards to secure your personal information. However, "perfect security" does not exist on the internet, and there is always some risk in transmitting information electronically. As we deem appropriate, we use security measures consistent with industry standards, such as firewalls and encryption technology, to protect your information.

Our web site may contain links to other web sites. We do not control privacy practices or content of any of our business partners, advertisers, sponsors, or other web sites we provide links to from our web site. You should check the applicable privacy policy of the web site sponsor when linking to other web sites.

We protect information of our former customers in the same way as for our current customers.

2. Accessibility

We are committed to providing everyone with access to this privacy notice and to our products and services. If you have any difficulty reading this notice, you may call us toll free at 855-515-9700 so that we may assist you.

3. Categories of Personal Information We Collect

We collect and use personal information that we believe is necessary to serve you effectively and to permit us to meet your needs. Information we collect includes information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your device. This information enables us to underwrite policies, process claims, ensure proper billing, service accounts, and manage relationships with prospective, current, and past employees. We also may collect personal information from insurance agents (if applicable) who may use our protected and secure Internet based portal to make changes to policies, make payments, and inquire about the status of customer accounts.

In addition, the information may also assist us with managing our business including but not limited to: maintaining business continuity plans, conducting internal audits, building actuarial and statistical models, and fulfilling various legal requirements, or to perform obligations under an existing contract with you.

Pursuant to the requirements of the California Consumer Privacy Act, the table below provides detail on the categories of personal information collected by us in the past twelve (12) months, and the purposes for which each category of personal information is used.

Category	Examples of personal information	Purposes
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online, identifier, alias, Internet Protocol address, e-mail address, account name, Social Security number, driver's license number, passport number, Unique Personal Identifier(s) and combinations, or other similar identifiers.	To: make contact with you when you are our customer or employee; conduct customer or employee needs assessments; conduct marketing research and analysis; improve the quality of products and services we deliver to customers and employees; inform you about our events, services, products and news when you visit our website or when you subscribe to our newsletter or mailing lists; build statistical models; process employee payroll; administer and maintain employee benefits including health insurance, 401K and/or retirement plans; and effectively manage and support employees throughout the hiring, on-boarding, employment, and post-employment phases of their relationship with us, including to conduct background checks to ensure that employees satisfy company policies required to carryout their duties.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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, legal violations, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, prior claims and loss information. Some Personal information included in this category may overlap with other categories.	To: make contact with you when you are our customer or employee; conduct customer or employee needs assessments; conduct marketing research and analysis; improve the quality of products and services we deliver to customers and employees; inform you about our events, services, products and news when you visit our website or when you subscribe to our newsletter or mailing lists; build statistical models; process employee payroll; administer and maintain employee benefits including health insurance, 401K and/or retirement plans; and effectively manage and support employees throughout the hiring, on-boarding, employment, and post-employment phases of their relationship with us, including to conduct background checks to ensure that employees satisfy company policies required to carryout their duties.
C. Protected classification characteristics 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).	To the extent that we collect protected classification information, we collect such information to comply with federal and state law and/or, to deliver employee benefits & services.
D. 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, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	In certain circumstances, we may collect information to comply with federal and state requirements and/or, to deliver employee benefits & services including employee health insurance.
E. Internet or other similar network activity.	Browsing history, search history, information on a Consumer's interaction with a Website, application, or advertisement; IP address; the website from which you visited us; the type of browser software used; the MAPFRE Website pages that you visit, and the date and duration of your visit to the MAPFRE Website; cookies (See "8. Cookies" of this Privacy Notice for more detail); social media data.	We may collect such information to enhance our marketing programs, and/or to build various statistical models to better determine consumer and employee preferences.

Category	Examples of personal information	Purposes
F. Geolocation data.	Physical location or movements	We may collect information to enhance our marketing programs, to build various statistical models to better determine consumer preferences, and/or to support our remote working program available to employees.
G. Professional or employment-related information.	Current or past job history or performance evaluations.	During the hiring process, we conduct background checks on prospective employees before finalizing an offer of employment.
H. Non-public education information.	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.	During the hiring process, we conduct background checks on prospective employees before finalizing an offer of employment. Such background checks may include requesting Non-public education information.
I. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	During the hiring process of prospective employees, and periodically with current employees, we may conduct personality and/or leadership assessments.

Categories of Information Sources

We collect information that we receive from a variety of sources including:

- Directly from you, including:
 - your insurance application;
 - through correspondence and communications from you, including name, address, and telephone number;
 - information about your transactions with us;
 - information that you provide to us on our web site;
- Indirectly from you including:
 - from observing your activity on our Website;
 - information from your insurance agent or broker (if applicable);
 - information from website usage (or traffic);
 - information from employee benefit vendors;
- Other Sources, including:
 - information that we receive from consumer reporting agencies;
 - information from customer lists provided by other organizations and marketing data providers;
 - information from governmental agencies and insurance-support organizations;
 - information relating to insurance claims, which may include medical information;
 - information that we receive from completing background checks during the initial employment stages.

4. Categories Of Third Parties With Whom We Share Your Information

We share your information with the following categories of third parties:

- industry regulators, law enforcement agencies or other governmental authorities;
- anti-fraud organizations;
- third parties who assist us in processing the transactions authorized by you and in providing services to us and to you;

- companies within the MAPFRE Insurance group;
- your insurance agent or broker (if applicable);
- third parties with whom we have joint marketing agreements in order to market our products;
- third parties who help us conduct research and analyze data to improve our products and services;
- attorneys or other authorized persons in connection with matters in litigation, as required by subpoenas and court rules and orders;
- our attorneys, accountants, and auditors; and
- such other parties as are specifically permitted or required by law.

Disclosures of Personal Information for a Business Purpose

In the past twelve (12) months, we have disclosed one or more data types in the following categories of Personal Information for a business purpose:

- Category A: Identifiers;
- Category B: California Customer Records Personal Information categories;
- Category C: Protected classification characteristics under California or federal law;
- Category D: Biometric information;
- Category E: Internet or other similar network activity;
- Category F: Geolocation data;
- Category G: Professional or employment-related information;
- Category H: Non-public education information;
- Category I: Inferences drawn from other Personal Information;

(For details of each Category, refer to Section 3 of this Notice.)

5. Sales of Personal Information

MAPFRE DOES NOT SELL PERSONAL INFORMATION TO THIRD PARTIES.

6. Your Rights Under California Law

California law grants you specific rights regarding your personal information including the “Right To Know,” “Right to Access,” “Right to Deletion,” “Right To Opt-Out,” and “Right To Non-Discrimination”. This section describes your rights and explains how you may exercise those rights.

Right To Know

Pursuant to the Californian Consumer Privacy Act (“CCPA”), you have the right to know of the categories of personal information we collect, and the purposes for which the categories of personal information are used. You also have a right to know of the categories of personal information that we have disclosed about you to another party for a business purpose.

Right to Access

Pursuant to the CCPA, 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. Once we receive your Verifiable Consumer Request, we will disclose to you:

- the categories of personal information we have collected about you,
- the categories of sources from which the personal information was collected,
- the business or commercial purpose for collecting personal information,
- the categories of third parties with which we share personal information, and
- the specific pieces of personal information we collected about you.

Right to Deletion (aka Right To Be Forgotten)

Pursuant to the CCPA, 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 a Verifiable Consumer Request from you, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

Right To Opt Out

California law requires businesses that sell personal information to third parties to provide consumers with the right to opt-out of that business selling their personal information to third parties. **We do not sell personal information to third parties.**

Right To Non-Discrimination

We do not discriminate against you for exercising any of your CCPA rights. Unless otherwise permitted by California law, we will not:

1. Deny you goods or services for which you are eligible.
2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
3. Provide you a different level or quality of goods or services.
4. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
5. However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. We do not currently provide any financial incentives to consumers.

7. Verifiable Consumer Requests

If you would like to request additional information on the personal information we collect about you or if you would like to request that we delete all applicable personal information about you, please submit a Verifiable Consumer Request through one of the following channels:

- Calling 855-515-9700
- E-mail request to ccparequest@mapfreusa.com
- Writing MAPFRE INSURANCE COMPANY, 211 MAIN STREET, WEBSTER, MA 01570 (Attention: Compliance Department)

Under California law, we are required to verify your identity before granting your right to access or delete personal information about you. Only you, or a person registered with the California Secretary of State who you authorize to act on your behalf, may make a Verifiable Consumer Request related to your personal information. You may also submit a Verifiable Consumer Request on behalf of your minor child.

You may only submit a Verifiable Consumer Request for access or data portability twice within a 12-month period.

The Verifiable Consumer Request must:

1. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
2. 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 ARE UNABLE TO VERIFY YOUR IDENTITY OR AUTHORITY TO MAKE THE REQUEST AND CONFIRM THE PERSONAL INFORMATION RELATES TO YOU.

You are not required to create an account with us before submitting a Verifiable Consumer 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.

We do not charge a fee to process or respond to Verifiable Consumer Requests unless it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

8. Cookies

We use "cookies" to enhance your access to our web site. A cookie is a small amount of data that is sent to your browser from a web server and stored on the hard drive of your computer or mobile communications device. We use cookies to store information and personalize your experience with our web site. For example, cookies allow our web site to recognize you as a previous visitor, and thus save and remember any preferences that may have been set while you were previously browsing our web site. You do have some control over cookies. Many browsers can be set to notify you when a cookie is being placed on your computer. Many browsers can also be set to refuse to accept cookies, although this may affect your internet experience. You can also erase cookies that are already on your computer. For more information about working with cookies, you should consult your user manual, FAQ, or "help" function of your specific browser and operating system software.

We use cookies only in connection with your interactions with our website over time, and do not use them to track your online activities across third-party websites and other online services.

9. Do Not Track

Some browsers have "do not track" features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. Instead, we collect, use, and share information as described in this Privacy Notice regardless of a "do not track" choice.

10. Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to ccparequest@mapfreusa.com, or write us at: MAPFRE INSURANCE COMPANY, 211 MAIN STREET, WEBSTER, MA 01570 (Attention: Compliance Department)

11. Changes to this Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this notice, we will post the updated notice on this website page and update the notice's review and effective dates respectively.

Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

MAPFRE Insurance[®] is a brand and service mark of MAPFRE U.S.A. Corp. and its affiliates, including American Commerce Insurance CompanySM (Columbus, OH), The Commerce Insurance CompanySM (Webster, MA); Commerce West Insurance CompanySM (Cal. COA. 06715, San Ramon, CA), and MAPFRE Insurance CompanySM (Cal. COA 18643, Florham Park, NJ).