MAPFRE | INSURANCE

CALIFORNIA PRIVACY NOTICE

If you are a resident of the state of California, this California Privacy Notice applies to you.
If you are a resident of a state other than California, click here to review the Privacy Policy that applies to you.

Effective Date: 01/01/2024
Last Updated on: 01/04/2024

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 website. We are committed to protecting the online privacy of visitors to our website. 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 website may contain links to other websites. We do not control privacy practices or content of any of our business partners, advertisers, sponsors, or other websites we provide links to from our website. You should check the applicable privacy policy of the website sponsor when linking to other websites.

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 may collect 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. We also may collect personal information from insurance agents (if applicable) who may use our protected and secure Internet based portal to administer policies.

In particular, we may have collected the following categories of personal information in the past twelve (12) months:

Category	Examples
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, e-mail address, Social Security number, driver's license number, and combinations or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A real 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.
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).
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, exercise data.
E. Internet or other similar network activity.	Browsing history, search history, information on your interaction with a website, application, or advertisement; IP address; the website from which you visited us; the type of browser software used; the website pages that you visit, and the date and duration of your visit to our website; cookies (See “9. Cookies” of this Privacy Notice for more detail); social media data.
F. Geolocation data.	Physical location or physical movement.
G. Professional or employment-related information.	Current or past job history or performance evaluations.
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.
I. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Categories of Information Sources

We may obtain the categories of personal information listed above from several categories of sources.

- Directly from you, including from:
  - your insurance application;
  - your employment application;
  - correspondence and communications with you;
  - information about your transactions with us; and/or
  - information that you provide to us on our website.

- Indirectly from you, including from:
  - observing your activity on our website;
  - your insurance agent or broker (if applicable);
  - website usage (or traffic); and/or
  - employee benefit vendors (if applicable).

- Other Sources, including from:
  - consumer reporting agencies;
  - customer lists provided by other organizations and marketing data providers;
  - governmental agencies and insurance-support organizations;
  - insurance claims, which may include medical information; and/or
  - sources to administer employee related benefits and services.

4. Use of Personal Information

We may use, disclose, or share (as these terms are defined under California law) personal information we obtain for one or more of the following purposes:

- To fulfill or satisfy the purpose for which you provided the information to us.

- To provide, support, personalize, and develop our website, products, and services.

- To create, maintain, customize, and secure your account with us.

- To process your requests, purchases, transactions, and payments and prevent transactional fraud.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.

- To personalize your website experience.

- To deliver content, product, and service offerings relevant to your interests, including targeted offers and advertisements through our website, third-party sites, and via email or text message with your consent, where required by law.

- 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 product development, including to develop and improve our website, products, and services.

- 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.

- 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 about our website users/consumers is among the assets transferred.

- 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.

- To deliver employee related benefits & services for prospective, current, and past employees.

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, fulfilling various legal requirements, and/or or to perform obligations under an existing contract with you.

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.

5. Sharing or Disclosing Personal Information

We may share or disclose information with the following categories of third parties:

Government, Regulatory, Law Enforcement, Legal Professionals
This category includes industry regulators, law enforcement agencies or other governmental authorities; attorneys or other authorized persons in connection with matters in litigation, as required by subpoenas and court rules and orders; anti-fraud organizations; our attorneys, accountants, and auditors; and such other parties as are specifically permitted or required by law.

Service Providers & Other Parties
This category includes third parties that assist us in processing transactions authorized by you and third parties that support our ability to provide services to you; third parties with which we have joint marketing agreements in order to market our products; and third parties that help us conduct research and analyze data to improve our products and services.

Employee Related Services
This category includes third parties that assist us to conduct various activities related to prospective, current and past employees including background checks, and administration of various employee and employee related services and benefits.

6. Categories of Personal Information Disclosed for a Business Purpose

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

CATEGORY OF PERSONAL INFORMATION	DISCLOSED TO
A. Identifiers.	Government, Regulatory, Law Enforcement, Legal Professionals; Service Providers & Other Parties; Employee Related Services.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Government, Regulatory, Law Enforcement, Legal Professionals; Service Providers & Other Parties; Employee Related Services.
C. Protected classification characteristics under California or federal law.	Government, Regulatory, Law Enforcement, Legal Professionals; Employee Related Services.
D. Biometric Information.	Government, Regulatory, Law Enforcement, Legal Professionals; Service Providers & Other Parties; Employee Related Services.
E. Internet or other similar network activity.	Government, Regulatory, Law Enforcement, Legal Professionals; Service Providers & Other Parties; Employee Related Services.
F. Geolocation data.	Government, Regulatory, Law Enforcement, Legal Professionals; Service Providers & Other Parties; Employee Related Services.
G. Professional or employment-related information.	Government, Regulatory, Law Enforcement, Legal Professionals; Service Providers & Other Parties; Employee Related Services.
H. Non-public education information.	Government, Regulatory, Law Enforcement, Legal Professionals; Service Providers & Other Parties; Employee Related Services.
I. Inferences drawn from other personal information.	Government, Regulatory, Law Enforcement, Legal Professionals; Service Providers & Other Parties; Employee Related Services.

Note: For details of each Category, refer to Section 3 of this Notice.

7. Categories of Personal Information Shared

In the past twelve (12) months, we may have shared one or more data types in the following categories of Personal Information with Service Providers & Other Parties:

- Identifiers;
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e));
- Protected classification characteristics under California or federal law;
- Internet or other similar network activity;

- Geolocation data;
- Professional or employment-related information;
- Non-public education information; and/or
- Inferences drawn from other personal information.

8. Sale of Personal Information

WE DO NOT SELL PERSONAL INFORMATION, INCLUDING THOSE OF MINORS UNDER THE AGE OF 16, TO THIRD PARTIES.

9. Categories of Sensitive Personal Information Collected

Under California law, certain categories of personal information are considered "sensitive personal information," including the following:

Category	Examples
A. Government identifiers.	Social security, driver's license, state identification card, or passport number.
B. Account and financial.	Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
C. Precise geolocation.	Data that is derived from a device and that is used or intended to be used to locate a consumer within a geographic area that is equal to or less than the area of a circle with a radius of one thousand, eight hundred and fifty (1,850) feet, except as prescribed by regulations.
D. Racial or ethnic origin.	Race or ethnicity
E. Citizenship or immigration status	Citizenship or immigration status
F. Religious or philosophical beliefs.	Religious or philosophical affiliations.
G. Genetic data.	Genetic data related to medical or genealogical makeup.
H. Communications.	The contents of a mail, email and text messages, unless the business is the intended recipient of the communication.
I. Health, sex life, or sexual orientation information.	Personal information collected and analyzed concerning a consumer's health; or personal information collected and analyzed concerning a consumer's sex life or sexual orientation.
J. Biometric.	The processing of biometric information for the purpose of uniquely identifying a consumer.

We may collect personal information that we believe is necessary to serve you effectively and to permit us to meet your needs.

Categories of Sensitive Information Sources

We may obtain the categories of sensitive personal information listed above from several categories of sources.

- Directly from you, including from:
  - your insurance application;
  - your employment application;
  - correspondence and communications with you;
  - information about your transactions with us; and/or
  - information that you provide to us on our website.

- Indirectly from you, including from:
  - observing your activity on our website;
  - your insurance agent or broker (if applicable);
  - website usage (or traffic); and/or
  - employee benefit vendors (if applicable).

- Other Sources, including from:
  - consumer reporting agencies;
  - customer lists provided by other organizations and marketing data providers;
  - governmental agencies and insurance-support organizations;
  - insurance claims, which may include medical information; and/or
  - sources to administer employee related benefits and services.

10. Use of Sensitive Personal Information

We may use and/or disclose sensitive personal information we obtain for one or more of the following purposes:

- To fulfill or satisfy the purpose for which you provided the information to us.

- To provide, support, personalize, and develop our website, products, and services.

- To create, maintain, customize, and secure your account with us.

- To process your requests, purchases, transactions, and payments and prevent transactional fraud.

- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.

- To personalize your website experience.

- 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 product development, including to develop and improve our website, products, and services.

- 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.

- 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 about our website users/consumers is among the assets transferred.

- 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.

- To deliver employee related benefits & services for prospective, current, and past employees.

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, fulfilling various legal requirements, and/or or to perform obligations under an existing contract with you.

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.

11. Sharing Sensitive Personal Information

WE DO NOT SHARE SENSITIVE PERSONAL INFORMATION, INCLUDING THOSE OF MINORS UNDER THE AGE OF 16, TO THIRD PARTIES.

12. Sale of Sensitive Personal Information

WE DO NOT SELL SENSITIVE PERSONAL INFORMATION, INCLUDING THOSE OF MINORS UNDER THE AGE OF 16, TO THIRD PARTIES.

13. 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," "Right to Correct," "Right to Limit Use," and "Right To Non-Discrimination." This section describes your rights and explains how you may exercise those rights.

Right To Know

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 and shared with third parties, including to whom the personal information was shared. You also have a right to know the categories of personal information that we have disclosed about you to another party for a business purpose, including the categories of persons to whom the personal information was disclosed.

Right to Access

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 or other period specified by law. For requests beyond the 12-month period, we will provide such information unless doing so proves impossible or would involve a disproportionate effort. Once we receive and confirm a Verifiable Consumer Request, from you 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(s) for which we collect or share your personal information,
- the categories of third parties to whom we disclosed your personal information, and
- the specific pieces of personal information we collected about you.

Right to Deletion (aka Right To Be Forgotten)
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
You have the right to opt-out of permitting us to share your personal information with third parties. If you opt-out, we will cease sharing your personal information with third parties, unless an exception applies. We do not share personal information for those consumers under the age of 16 without prior consent. California law also 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, including those of minors under the age of 16, to third parties.

Right to Correct
You have the right to request that we correct any inaccurate personal information that we have about you, taking into account the nature of the personal information and the purposes of the processing of the personal Information. Once we receive and confirm a Verifiable Consumer Request from you, we will use commercially reasonable efforts to correct inaccurate personal information as directed by you.

Right to Limit Use
You have the right to request that we: (1) limit our use of your sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services; (2) use your sensitive personal information for certain limited business purposes defined by law; or (3) as otherwise authorize by law. We do not use your sensitive personal information other than for the limited purposes of performing necessary services for you or as otherwise permitted and authorized by law.

Right to Non-Discrimination
You have the right non-discrimination or retaliation by us as further described in Section 10 of this Policy.

14. 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 contact options:

- Calling 855-515-9700
- E-mail request to ccparequest@mapfreusa.com
- Writing MAPFRE INSURANCE COMPANY, Attention: Policy Services Department
  1555 North Fiesta Blvd, Gilbert AZ 85233
- Click here to submit a Verifiable Consumer Request

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. Upon receiving a request, we are required to verify your identity before granting your right to access or delete personal information about you. 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. We will verify your request by matching the

information you provide to us with information we have about you. We will request the following information from you: Full Name, Mailing Address, and telephone number. You may, but are not required to, include Email, Policy Number (if applicable), and Claim Number (if applicable) with your Verifiable Consumer Request.

2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to your request.

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 have the right to receive a response within 30 business days of submitting a Verifiable Consumer Request.

If we deny your request, you have the right to file a statement regarding what you believe to be accurate and fair information and why you disagree with our refusal.

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.

If you wish to submit a request through an authorized agent, we require the following before we can process the request:

- A copy of your signed permission authorizing the agent to make the request;
- That you verify your identity directly with us; or
- Direct confirmation from you that you authorize the agent to make the request.

If your authorized agent has a valid power of attorney under California Probate Code sections 4000 to 4465, we may request proof of the power of attorney. We may deny a request from an agent that does not submit proof you authorized them to act on your behalf.

15. 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. Retaliate against an employee, applicant for employment, or independent contractor, for exercising their rights.

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.

16. Cookies

We use “cookies” to enhance your access to our website. 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 website. For example, cookies allow our website 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 website. 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 to perform statistical analysis, authenticate user sessions, and improve and customize our services by analyzing your browsing habits.

17. 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.

18. 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.

19. Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

- Calling 855-515-9700
- E-mail request to ccparequest@mapfreusa.com
- Writing MAPFRE INSURANCE COMPANY, Attention: Policy Services Department
  1555 North Fiesta Blvd, Gilbert, AZ 85233

20. 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 Company℠ (Columbus, OH), The Commerce Insurance Company℠ (Webster, MA); Commerce West Insurance Company℠ (Cal. COA. 06715, San Ramon, CA), and MAPFRE Insurance Company℠ (Cal. COA 18643, Florham Park, NJ).