

California Consumer Privacy Act Notice

Effective Date: January 1, 2020

This Notice reflects our good faith understanding of the California Consumer Privacy Act (CCPA) and our data practices as of January 1, 2020, but the CCPA's implementing regulations are not yet final, and there remain differing interpretations of the law. Accordingly, we may update information regarding our data practices and your rights, modify our methods for responding to your requests, and/or supplement our response to your requests, as we continue to develop our compliance program to reflect the evolution of the law and our understanding of how it relates to our data practices.

This California Privacy Notice (“**Notice**”) applies to “Consumers” as defined by the California Consumer Privacy Act (“**CCPA**”), and supplements other Worldwide Insurance Services, LLC (Worldwide Services Insurance Agency, LLC in California and New York) trading as GeoBlue® (“GeoBlue”) privacy policies and notices. In the event of a conflict between any other GeoBlue policy, statement, or notice and this Notice, this Notice will prevail as to California Consumers and their rights under the CCPA.

In accordance with the CCPA’s requirements, this Notice covers the calendar year 2019 and describes our collection, use, disclosure, and sale of California Consumers’ “Personal Information” (“**PI**”), as well as rights California Consumers have under the CCPA. Terms defined in the CCPA that are used in this Notice have the same meanings as in the CCPA.

Consistent with the CCPA, job applicants, current and former employees, contractors, and subjects of certain business-to-business communications action in their capacity as representatives of another business are not considered Consumers for the purposes of this Notice or the rights described herein.

COLLECTION AND USE OF PERSONAL INFORMATION

We collect PI about California Consumers as described in the table below.

| Category | Examples of PI Collected | Sources of PI | Purposes for PI Collection | Categories of Recipients |
|--------------------|---|--|---|---|
| Identifiers | Name, physical address, phone number, Internet Protocol address, email address, social security number, unique personal identification number | Consumers, Plan Sponsors, Insurance Brokers, Health Care Providers | Managing interactions and transactions; detecting security incidents and protecting against fraud; debugging; performing services; internal research and development; and quality/safety control. | Internet Service Providers (ISPs), analytics providers, operating systems and platforms, Health Care Provider |

| Category | Examples of PI Collected | Sources of PI | Purposes for PI Collection | Categories of Recipients |
|--------------------------------------|--|--|---|---|
| Customer / Individual Records | Name, physical address, telephone number, email address, payment card details and bank account information, employment information, health data, and medical records | Consumers, Plan Sponsors, Insurance Brokers, Health Care Providers | Managing interactions and transactions; detecting security incidents and protecting against fraud; debugging; performing services; internal research and development; and quality/safety control. | ISPs, analytics providers, operating systems and platforms, Health Care Providers |
| Protected Characteristics | Marital/familial status, disabilities, medical conditions | Consumers, Plan Sponsors, Insurance Brokers, Health Care Providers | Managing interactions and transactions; detecting security incidents and protecting against fraud; performing services; | Operating systems and platforms, Health Care Providers |
| Internet Usage Information | Browsing history, search history, information regarding interactions with our website. | Consumer's use of our website | Managing interactions and transactions; detecting security incidents and protecting against fraud; debugging; performing services; internal research and development; | Analytics and other Service Providers |
| Sensory Data | Audio recordings of customer service calls | Consumer | Managing interactions and transactions; detecting security incidents and protecting against fraud; performing services; quality/safety control. | N/A |

| Category | Examples of PI Collected | Sources of PI | Purposes for PI Collection | Categories of Recipients |
|---|--|----------------------|--|---------------------------------|
| Professional or Employment Information | Professional, educational, or employment-related information | Employers | Managing interactions and transactions; performing services; | N/A |
| Inferences from PI Collected | Customer profiles reflecting preferences and characteristics | Consumer | Managing interactions and transactions; performing services | Service Providers |

In addition, we may collect, use, and disclose your PI as required or permitted by applicable law. We do not treat de-identified data or aggregate consumer information as PI, and we reserve the right to convert, or permit others to convert, your PI into de-identified data or aggregate consumer information.

We may share your PI with our affiliates, service providers, vendors (including those that facilitate interest-based advertising and other advertising and marketing), and other parties as described in the table above. These parties may use your PI for some or all of the above-listed business purposes, subject to the CCPA’s restrictions and obligations.

GeoBlue does not “sell” (as the term “sale” is defined by the CCPA) Consumer PI).

CALIFORNIA PRIVACY RIGHTS

Under the CCPA, California Consumers have certain rights which they may exercise independently or through an authorized agent. CCPA rights requests are subject to an identification and verification process. We will not fulfill a CCPA request unless we have been provided sufficient information for us to reasonably verify the identity of the requestor and the validity of the request.

Some PI that we maintain about Consumers (e.g., clickstream data) is not sufficiently associated with enough PI about the Consumer for us to be able to verify that it is a particular Consumer’s PI. Accordingly, we will not include such information in response to Consumer requests. If we cannot comply with a request, we will explain the reasons in our response. We will use PI provided in your request to verify your identity or authority to make the request and to track and document request responses, unless you also provided the PI to us for another purpose.

We will make commercially reasonable efforts to identify Consumer PI that we collect, use, store, disclose, or otherwise process, and to respond to your California Consumer privacy rights requests. In some cases, particularly with voluminous and/or typically irrelevant data, we may provide you with a summary of your PI and give you the opportunity to elect whether you want us to provide the entire data set. Alternatively, we may direct you on how to access and copy responsive PI yourself. We may charge a reasonable fee or refuse to act upon a request if the request is excessive, repetitive, unfounded, or overly burdensome. If we determine that the request warrants a fee, or that we may decline to comply with the request, we will give you notice explaining why we made that

decision. In the case of a fee, we will provide a cost estimate and the opportunity to accept such fees before charging you for responding to your request.

Your California Consumer privacy rights are described below. To make a request, please email us at privacy@geo-blue.com or call us at 1-855-282-3517. We will take appropriate steps to confirm the identity of a Consumer making a request for purposes of verifying the authenticity of the request. You may be required to provide certain PI to allow us to verify that you are the Consumer about whom the request is being made. If you request that we provide you with specific pieces of information about you, we will apply the heightened verification standards. An authorized agent may submit a request on behalf of a Consumer if the Consumer has provided the authorized agent with power of attorney in accordance with California law. Alternatively, the agent must (1) present verifiable written authorization from the Consumer that the agent has the Consumer's permission to submit the request; and (2) independently verify the agent's own identity with GeoBlue.

We may collect, use, and disclose your PI as required or permitted by applicable law. Please note we are not obligated to comply with consumer requests to the extent that doing so would infringe on our, or any other person's or party's, rights or conflict with applicable law.

Disclosure Rights

You have the right to request that we disclose the following information:

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for collecting or Selling your PI.
- The categories of third parties to whom we have shared your PI.
- The specific pieces of PI we have collected about you.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or a statement that no such disclosure occurred.
- A list of the categories of PI Sold about you in the prior 12 months, or that no Sale occurred. If we Sold your PI, we will explain (1) the categories of your PI we have Sold, and (2) the categories of third parties to which we Sold PI.

You have the right to make or obtain a portable copy of your PI that we (1) have collected in the 12 months prior to the request date and (2) currently are maintaining. Please note that we retain PI for various time periods in accordance with applicable law and our internal recordkeeping policies and procedures.

Consumer requests of this nature may be made no more than 2 times in a 12-month period.

“Do Not Sell” Rights

We do not sell California Consumer PI as defined under the CCPA and, until such time as we change our practices by updating this Privacy Notice, will treat PI collected under this Notice as subject to a “do not sell” request.

Some browsers include features that may be characterized as “do not track” signals. As is the case with many websites, currently the transmission of a “Do Not Track” signal from a visitor's browser

will not alter our practices with respect to data collection on our websites. Further, we do not interpret “do not track” signals to represent a “do not sell” request for CCPA purposes. We understand that various parties are developing “do not sell” signals, and we may recognize certain such signals if we conclude such a program is appropriate.

Deletion Rights

Except to the extent we have a basis for retention under the CCPA, you may request that we delete your PI that we have collected directly from you and are maintaining. Our retention rights include, without limitation, retaining PI to complete transactions and provide services you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes such as maintaining business records, to comply with law or otherwise cooperate with law enforcement, and to exercise or defend legal claims. Note also that we are not required to delete your PI that we did not collect directly from you.

Non-Discrimination Rights

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights.

California’s “Shine the Light” Law

California’s “Shine the Light” law permits customers in California to request certain details about how certain types of their information are shared with third parties and, in some cases, affiliates, for those third parties’ and affiliates’ own direct marketing purposes. Under this law, a business must either provide California customers certain information upon request or permit California customers to opt in to, or opt out of, this type of sharing.

We do not share Personal Information with third parties or affiliates for those third parties’ or affiliates’ own direct marketing purposes. If you are a California resident, you may request information about our compliance with this law by contacting us at privacy@geo-blue.com or by sending a letter to Worldwide Insurance Services, LLC (GeoBlue), 933 First Avenue, King of Prussia, PA 19406. Requests must include “California Privacy Rights Request” in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer annually.

Please note that “Shine the Light” rights and CCPA rights are established under different legal regimes and must be exercised separately.

CONTACT US

For more information regarding your California privacy rights, you may contact us at 1-855-282-3517 or email us at privacy@geo-blue.com. You may also write to us at Worldwide Insurance Services, LLC (GeoBlue), 933 First Avenue, King of Prussia, PA 19406.