

Privacy Policy

1. What Our Privacy Notice Covers

This Privacy Notice covers our member facing operations and applies to personal information obtained via various means (online and offline), including when you access or use: a) our website, b) mobile applications or any other application or service that links to this Notice, c) visit our office, d) call us, e) email us or otherwise communicate with us, f) engage with us through online advertising networks or on social media, or g) participate in any of our programs, shows or events. This Notice applies to any affiliate or subsidiary interface linking to it. A separate or additional privacy notice may apply to information collected through other means and via other services such as insurance. Please consult those notices if warranted. In using our website, you may be directed to third party sites that have their own separate privacy policy that would apply to information they collect. For example, when you apply online, you may be directed to a partnered financial institution that is governed by its own privacy and security policy. To determine if you are on a third-party site, please examine the **URL address** at the top of the web page and the privacy disclosure at the bottom. Review these separate non-TrueSpan Group privacy policies when you encounter them.

2. Categories of Personal Information

Personal information refers to information that identifies, relates to, describes, or can be associated with you. For purposes of this Notice, there are 12 categories (A-L) of personal information listed below.

Category A. Personal Identifiers

Identifiers such as real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, SSN, driver's license number, passport number or other similar identifiers.

Category B. Statutory Information

Information set forth that identifies, relates to, describes, or is capable of being associated with, an individual or household, including:

- 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

“Personal information” does NOT include publicly available information that is lawfully made available to the public from federal, state, or local government records.

Category C. Characteristics

Characteristics of protected classifications under Missouri or federal law such as race, color, sex, age, national origin, disability, citizenship status, genetic information, ancestry, sexual orientation, gender identity or expression, religion, medical conditions, AIDS/HIV, marital status, military/vet status, political affiliations or activities, victims of domestic abuse and/or assault/stalking.

Category D. Commercial Information

Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Category E. Biometric

Records used to uniquely identify a person including fingerprints, retinal scans, facial scans, signatures, handwriting analysis and voice pattern recognition.

Category F. Internet Activity

Internet or other electronic network activity information, including but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement.

Category G. Geolocation

Used to identify an electronic device's physical location, such as GPS coordinates.

Category H. Sensory

Audio, electronic, visual, thermal, olfactory, or similar information.

Category I. Employment Related

Professional or employment-related information such as job application, salary, and job performance information.

Category J. Education

Non-publicly available information that pertains to school, grades or years attended.

Category K. Inferences

Inferences drawn from any of the above identified information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Category L. Sensitive Personal Information

Non-publicly available personal information that reveals a consumer's:

- social security, driver's license, state identification card or passport number.
- 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.
- precise geolocation.
- racial or ethnic origin, religious or philosophical beliefs or union membership.
- mail, email, and text message contents unless we are the intended recipient of the communication.

- genetic data.

Sensitive Personal Information also includes:

- The processing of biometric information to uniquely identify a consumer.
- Personal information collected and analyzed regarding a consumer's health, sex life or orientation.

3. Personal Information We Collect

During the prior 12 months, we would have collected personal information for each of these 12 categories (A-L). However, the fact that we collected information for a category does not mean that we collected all the information in the category. For example, category A (identifiers) includes name, address, driver's license, social security number, passport, etc. If we state that we collect this category of information, it does not mean that we collected every one of these identifiers. Frequently, we only collect name and contact information and don't collect more sensitive information such as driver's license, social security number or passport unless it is required for the service requested such as a driver's license for DMV services or a passport for international travel. While category C (characteristics) includes a broad list of characteristics of protected classifications (e.g., genetic information or sexual orientation, etc.) if we collect information for this category, it is generally limited to sex and/or age. Below, we further describe the specific pieces of personal information collected.

A. When Using our Products and Services

Below, you will find a description of our products and services and the specific pieces of information that should generally be collected for each.

B. When Contacting Us

When you contact us, we should ask you to provide and/or confirm your contact information. (Categories A and B).

If you visit an office, video surveillance may be recorded. We should have asked you to check in or otherwise provide your name and contact information. To service your request, we would have collected personal information (as described previously). (Categories A, B, E and H).

If you visited online or used an App, your internet/online activity and online identifier would have been collected. This includes your geolocation when using the App. To service your request, your personal information would have been collected (as described previously). (Categories A, B, F, G and L).

If you called, your phone number may have been automatically collected, and your call may have been recorded. To service your request, we would have collected personal information (as described previously). (Categories A, B, and H).

C. Conducting Business

1. Marketing & Understanding Consumers

We collect information to better understand our members and to more effectively market our products and services to existing and potential members.

This includes collecting internet activity information for those online. We collect information for online behavioral advertising and analytics purposes. (Categories A, F, G and L).

2. Security Purposes

Our efforts to safeguard personal and company information, facilities, and people require that we monitor and collect information by different means and from many environments. This could include through video surveillance, license plate reader technology or internet/online activity for cyber security purposes. Sources may include from the consumer, third party security providers and/or government entities including law enforcement. (Categories A, B, E, F, H and L).

3. Transactional Purposes

To fulfill a transaction or request or to process a payment, we may collect information from you and service providers. For example, with any purchase we collect payment information depending on the method of payment. This could include payment card information or financial account information from a check or with an ACH enrollment. (Categories A, B and D).

4. Legal, Regulatory, Compliance Purposes

We may collect personal information for legal, regulatory and compliance purposes. For example, we may collect your contact information from third party sources (government entities, law enforcement, regulatory bodies and/or private businesses) to ensure that we have your current contact information (e.g., physical address) and to honor your requests to not be contacted or solicited. For example, we purchase Do Not Call lists to honor the wishes of those who do not wish to be called for marketing purposes. (Categories A, B and C).

D. When Using Our Website or Mobile Applications

We collect information that you provide directly when you use our website and App. This could include your contact information (such as your name, postal address, email address, and telephone number), driver's license, vehicle and property information, financial account information and other information that you provide. When you visit our website, third parties including advertising partners and analytics providers may collect other information over time about your online activity across websites and the various devices you use. (Categories A, B, F, G and L).

We partner with third-party advertising networks to serve our ads when you visit other sites across the Internet. Our partners may employ cookies, web beacons and other tracking technologies to gather information about your activity on this and other websites and to then provide you with our ads on other websites. These tracking technologies permit us to analyze, modify, and improve our advertising content. We do not have access to or control over cookies or other features these third-party advertising networks may use, and their information practices are not covered by this Notice.

We may also indirectly gather information about your online visit including your Internet service provider, Internet Protocol (IP) address, unique device ID, geolocation, mobile device type, browser type, operating system, the date and time the website that referred you and the pages you visit while at our site. We may also use Session Replay scripts to learn how you interact with our website. These scripts track your online movements to learn how you navigate and interact with our site and can be used to improve our website by identifying and correcting confusing and non-functioning parts of a web page. We restrict employee access to such scripts, keep these scripts for only a limited time and redact the display of Personal Information within the scripts in order to protect your information. (Category A, F and G).

We gather such information using a "cookie" which is a feature of your Internet browser that places a small file on your computer's hard drive. A cookie facilitates site navigation for Internet sessions and helps maintain security. It can remember your personal

settings, pre-fill forms for you, and monitor how you use our website and which information we use to improve our services. (If you do not enable cookies on your browser, you may not be able to use some of the services on our website).

If you provide your email address, we may send you email offers and otherwise conduct business with you. With each marketing offer, we will give you the opportunity to opt out of future email offers. If you opt out of marketing offers, we may still email you for non-marketing purposes. *For example, we could send email confirmation if you request a quote.*

We also use cookies, tags (also referred to as pixel tags, 1x1s, or transparent GIFs), and other technologies to manage our email programs. These tags gather information to analyze the performance of our email marketing and help us understand how consumers respond to our messages. (Category A, B, and F).

4. How We Collect Your Personal Information

We collect personal information about you from various sources including the following:

A. From You

We collect personal information you provide, such as when you request service, make a purchase, register your Account, contact us, respond to a make an appointment, visit us, RSVP for an event or participate in a sweepstakes, contest or similar campaign or promotion, apply for a job or sign up to receive emails, text messages, and/or postal mailings.

We record service calls for quality assurance. We also use video surveillance in our office for safety, security, fraud, loss prevention and operational purposes.

B. From Digital Sources

When you visit our website, open or click on emails we send you, or interact with any of our advertisements, we or third parties we work with automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see **Section: [Cookies and Similar Tracking Technologies](#).**

If you interact with us on social media or use features, such as plugins, widgets, or other tools made available by social media platforms or networks in connection with our website, we collect information that you share with us, or that the social media platforms share with us. For more information about the privacy practices of those social media platforms, please review their privacy policies and settings of the social media platforms and networks that you use.

If you call us, we may record service calls. If you visit us, depending on the location, we may record you through surveillance technology or collect license plate information.

C. From Government/Legal

We collect personal information from government, regulatory agencies, law enforcement and litigation. For example, we collect information from Department of Motor Vehicles when processing vehicle registration.

D. From Product Providers

We obtain information from third parties that we partner with, and other third parties we choose to collaborate and work with.

E. From Service Providers

We collect personal information about you from service providers such as data analytic providers, marketing or advertising service providers, fraud prevention service providers, financial service providers and other vendors providing services that assist in the operation of our business.

5. Cookies and Similar Tracking Technologies

We and our third-party partners (such as advertising and analytics providers) use cookies, web beacons, clear GIF, pixels, internet tags, and other similar tracking technologies (collectively, “tracking technologies”) to gather information when you interact with our website and email communications. Some tracking technologies help us maintain the security of our website and your account, prevent crashes, fix bugs, note your preferences, and assist with basic site functions. Other tracking technologies provide us with information regarding how visitors interact with our website. Such

technologies allow us to understand, for example, more about those who visit our website, the frequency of such visits, and the number of times a user views a specific page.

We may use Adobe, Google Analytics, and Microsoft for these purposes. To learn more about Adobe Analytics privacy practices or to opt-out of cookies set to facilitate reporting, visit Adobe Privacy Center <https://www.adobe.com/privacy.html>. For more information about Google Analytics, please refer to “How Google Uses Data When You Use Our Partners’ sites or apps”, located at www.google.com/policies/privacy/partners/, or any other URL Google may provide from time to time. To access and use the Google Analytics Opt-Out Browser Add-On by visiting tools.google.com/dlpage/gaoptout/. To learn more about Microsoft privacy practices and how Microsoft may collect or receive personal information to provide us with Microsoft Advertising services, visit <https://www.microsoft.com/en-us/privacy/privacystatement>.

We may also permit third parties to use tracking technologies on our websites for analytics and advertising, including helping to manage and display advertisements, to tailor advertisements to your interests, (depending on your communication preferences). The third parties use their technology to provide advertising about products and services tailored to your interests which may appear either on our website or on other websites.

6. How We Use Your Personal Information

We collect and use personal information for many reasons as disclosed throughout this Notice and when:

Communicating with You

We use personal information to communicate with you whether it’s by mail, in-person, over the phone, online and/or electronically.

Providing Products and Services

We use your personal information to offer and provide our products and services to members. T

Marketing and Promotional Purposes

We use personal information to market and promote member products and services by various means including by email, mail, text, and phone; to show you advertisements for products or services tailored to your interests on social media and other websites; and to administer contests and similar promotions and events.

Analytics and Personalization

We use personal information for research and analytic reasons to understand your online interactions via our website, online advertisements, and email communications; to determine how to more effectively offer our products and services; to improve these online features; to personalize your experience and customize our marketing; to provide products and services; and to better understand you.

Core Business Functions

We use personal information for core business functions such as fulfilling & processing purchases and services, maintaining records, for compliance, regulatory and legal purposes, and financial and accounting purposes.

Security and Fraud Prevention

We use personal information to monitor our properties, to detect, investigate, prevent or act upon potential malicious, deceptive, fraudulent, or illegal actions (including cyber and physical security incidents), and to prevent and/or respond to harm to the property or safety of our organization and our members, customers, employees and others.

7. How and Why We Share Your Personal Information

During the prior 12 months, we would have shared personal information for the following business or commercial purpose with the types of third parties and for the categories of personal information listed below.

When Using our Products and Services

Conducting Business

Marketing Service Provider

We share information with service providers to market our products and services to members and potential members. Your name, contact information, membership information, age/sex, and a profile about you could be shared depending on the method of solicitation. (Categories A, B, C, D and K).

We collect internet activity information for those online and share such information with providers for email marketing, online behavioral advertising and analytics purposes. (Categories A and F).

As a membership organization, we regularly measure member satisfaction by surveying members. We may share your contact information with those who provide these services. (Categories A and B).

Security Purposes

Our efforts to safeguard personal and company information, facilities and people require that we monitor and collect information by different means and from many environments and share information with service providers that assist in this regard. This could include through video surveillance or internet/online activity for cyber security purposes. In some circumstances, personal information may be shared with law enforcement, and security providers. (Categories A, B, C, E, F, G, H and L).

Transactional Purposes

To fulfill a transaction or a request or to process a payment, we share information with various service providers. For example, payment information such as payment card information or financial account information from a check or with an ACH enrollment would be shared with financial institutions and those service providers that process payments. (Categories A, B and D).

Legal, Regulatory, Compliance Purposes

We share personal information with third parties (e.g., government entities, law enforcement, regulatory bodies and/or private businesses) if required for legal, regulatory and compliance purposes and share with those that assist us in responding in such circumstances. For example, we could be obligated to share your name, contact

information, and other information in the event of a regulatory investigation or in the event of litigation. (Categories A, B, C, D and L).

8. How We Protect Your Personal Information

Protecting your information is important to us. We establish, implement, and maintain administrative, technical, physical, electronic, and procedural safeguards to protect your personal information.

For example, we limit access to this information to authorized employees and contractors who need to know. We review the information security practices of vendors with whom we share personal information. We would also notify affected individuals as required by appropriate law in the event of a data breach. Please be aware that although we make every effort to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

Updating & Correcting Your Information

You can update or correct your contact information by:

- Logging on your online account (My Account) and updating your personal and contact information;
- Calling our office number; or
- Visiting our office and speaking with a representative.

Solicitation and Marketing

If you do not want offers from us or our affiliates, please request to be placed in our Do Not Solicit file opting out or by going to your online account to manage your communication preferences, or by writing to us: Attention: TrueSpan Privacy, {{company address}} and provide your full name and street address, telephone number and email address along with your request to be placed in our Do Not Solicit file. Your request will take place within 60 days of receipt. During this time, you may receive mailings that were already in progress. You will continue to receive your bills and renewal notices.

12. Changes to This Notice

We may amend this Privacy Notice at any time. Please review it periodically. Any changes are effective upon the date at the top of this Notice and upon our posting of the revised Notice. Your use of our website or App following any such change constitutes acceptance.

Categories of Personal Information We Collect and Our Purpose for Collection and Use

- Please find a list of the categories of personal information that we collect in **Section 3: *Personal Information We Collect***.
- For details regarding the sources from which we obtain personal information, see **Section 4: *How We Collect Your Personal Information***.
- We collect and use personal information for the business or commercial purposes described throughout this Notice and above in **Section 3: *Personal Information We Collect*** and in **Section 6: *How We Use Your Personal Information***.

Categories of Personal Information Disclosed and Categories of Recipients

During the prior 12 months, we disclosed the following categories of personal information for business or commercial purposes to the types of recipients listed below:

We share Category **A** information (Identifiers) with TrueSpan Group related sources, digital providers, government/legal sources, product providers and service providers.

We share Category **B** information with TrueSpan Group related sources, digital providers, government/ legal sources, product providers and service providers.

We share Category **C** information (Characteristics) with government/ legal sources and service providers.

We share Category **D** information (Commercial Information) with TrueSpan Group related sources, digital providers, product providers and service providers.

We share Category **E** information (Biometric) with government/legal sources and service providers.

We share Category **F** information (Internet Activity) with digital providers such as advertising networks and social media platforms and service providers.

We share Category **G** information (Geolocation) with digital providers, product providers and service providers.

We share Category **H** information (Sensory) with service providers.

We share Category **I** information (Employment related) with service providers.

We share Category **J** information (Education) with service providers.

We share Category **K** information (Inferences) with service providers.

We share Category **L** information (Sensitive Personal Information) with government/legal sources and service providers.

For more information regarding how your information is shared, see **Section 7: *How and Why We Share Your Personal Information***. We may also need to share any of the above categories of information pursuant to legal process and as described and as described elsewhere in this Notice.

How Long Do We Retain Each Category of Personal Information?

We retain your personal information in line with our legal obligations, record retention policy, or as otherwise permitted by law. We will delete your personal information once the legal obligation expires or after the period of time specified in our record retention policy. The period of retention is subject to our review and alteration.