

BELL & CLEMENTS GROUP - CCPA PRIVACY POLICY

UPDATES TO THIS PRIVACY POLICY

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our information practices or relevant laws. We will post notice on our website via the Privacy Policy link to notify you of any substantive changes to the way we collect and use information. We will indicate below when the privacy policy was last updated.

Last Updated Date: 28/09/2022

INTRODUCTION

This CCPA Privacy Policy explains how Bell & Clements Ltd and Bell & Clements Inc. (Bell & Clements Group) (“we” or “us”) collect, use, and disclose personal information subject to the California Consumer Privacy Act (“CCPA”). “Personal information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident (“consumer”) or household. This CCPA Privacy Policy also describes the privacy rights of California consumers and how they can exercise those rights.

The CCPA does not apply to certain types of information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”) or the Fair Credit Reporting Act (“FCRA”). This means that this CCPA Privacy Policy may not apply to personal information that we may collect about individuals who seek, apply for, or obtain insurance products or services for personal, family, or household purposes. The CCPA also has limited application to personal information we collect in connection with providing a product or service to a business.

The nature of our insurance business at the Bell & Clements Group requires that we gather and maintain a variety of information about our current and potential customers and consumers, including non-public personal information about individuals. We are committed to keeping confidential and secure any such non-public personal information. We will disclose non-public personal information obtained in the course of our business only as permitted by law

PERSONAL INFORMATION WE MAY COLLECT

We may collect, and in the past 12 months may have collected, the categories of personal information described below from the sources described below. Some of this personal information may be subject to GLBA or FCRA.

Directly From You

We may collect, and in the past 12 months may have collected, the following categories of personal information about you that you include in your application or other forms that you submit, or that you otherwise provide to us:

- Personal identifiers, such as name, postal address, email address, social security number, account number, policy number or driver’s license number.
- Customer records information, such as name, signature, social security number, email address, phone number, driver’s license number, insurance policy number, education information, professional or employment related information, bank account number, credit or debit card information (e.g. receipts), other financial information, health insurance information or medical

information.

- Protected information, such as race, religion, sexual orientation, citizenship, medical condition, physical or mental disability, ancestry, national origin, gender, age, or marital status.
- Commercial information, such as records of personal property and insurance products or services purchased or obtained, purchasing or consuming histories, or transaction or account information.

From Our Affiliates and Third Parties

We may collect the following categories of personal information about you from our affiliates, insurers, reinsurers and other third parties, such as brokers, agents, coverholders, or loss adjusters:

- Personal identifiers, such as name, postal address, email address, social security number, account number, policy number, or driver's license number.
- Customer records information, such as name, signature, social security number, email address, phone number, driver's license number, insurance policy number, education information, professional or employment related information, bank account number, credit or debit card information (e.g. receipts), other financial information, health insurance information or medical information.
- Protected information, such as race, religion, sexual orientation, citizenship, medical condition, physical or mental disability, ancestry, national origin, gender, age, or marital status.
- Commercial information, such as information about your transactions with our affiliates or other parties (e.g., balances and payment history), records of personal property and insurance products or services purchased or obtained, purchasing or consuming histories, transaction or account information, credit-worthiness, claims history, or credit history
- Applications or other underwriting forms. These forms provide us with information we need as part of the underwriting process; this can include such nonpublic personal information as individuals' names, addresses, social security numbers and any other information about individuals that we are authorized to obtain in order to underwrite and administer policies and claims.

We may also draw inferences from the personal information we collect directly from you or from our affiliates and third parties.

HOW WE USE PERSONAL INFORMATION

The purposes for which we use personal information depend on our relationship or interaction with a specific California consumer. We may use, and in the past 12 months may have used, personal information to underwrite your insurance policy and evaluate claims under your policy; to operate and manage our business; to provide and maintain our insurance products and services; to verify your identity; to detect and prevent fraud; for vendor management purposes; to operate, manage, and maintain our business, such as developing our products and services; to conduct research and data analysis; to comply with applicable laws; to respond to civil, criminal, or regulatory lawsuits or investigations; to exercise our rights or defend against legal claims; to resolve complaints and disputes; to perform compliance activities; and to perform institutional risk control.

PERSONAL INFORMATION WE DISCLOSE

We may disclose, and in the past 12 months may have disclosed, the categories of personal information described in “Personal Information We May Collect” for the purposes described in “How We Use Personal Information” to the following categories of third parties:

- Affiliates
- Insurers
- Reinsurers
- Brokers
- Agents
- Coverholders
- Service providers, such as loss adjusters, fraud prevention services, and software providers
- Regulatory and law enforcement agencies
- Attorneys, auditors, and other business partners

In the past 12 months, we did not sell any personal information, as the term “sell” is defined under the CCPA.

CONFIDENTIALITY OF HEALTH AND MEDICAL INFORMATION

It is often necessary for us to obtain personal health information in order to underwrite and process claims for various types of insurance coverages. We recognize concerns about the security of that information and want to provide assurance that any personal health data provided to us or that we otherwise obtain will be held in strict confidence. We will not disclose or share personal medical information for marketing or any other unauthorized purpose. We may disclose or share personal medical information as permitted by law; for example, in order to underwrite policies or administer policies or claims.

YOUR RIGHTS

You may have certain rights under the CCPA. These rights are subject to certain conditions and exceptions. Your rights under the CCPA may include:

- **Right to Request to Know.** You have the right to request to know the following information about our practices over the past 12 months: (i) the categories of personal information we collected about you; (ii) the categories of sources from which we collected the personal information about you; (iii) the categories of third parties with whom we shared personal information, (iv) the categories of personal information we sold or disclosed about you and the categories of third parties to whom we sold or disclosed that particular category of personal information; (v) our business or commercial purpose for collecting or selling your personal information; and (vi) the specific pieces of personal information we collected about you.

You may exercise your right to request to know twice a year, free of charge. If we are unable to fulfil your request to know, we will let you know the reason why. Please note, in response to a request to know, we are prohibited from disclosing your Social Security number; driver’s license number or other government-issued identification number; financial account number; any health insurance or medical identification number.

- **Right to Request to Delete.** You have the right to request that we delete the personal information that we have collected from you. We may deny your request under certain circumstances, such as if we need to retain your personal information to comply with our legal obligations or if retaining the information is necessary to complete a transaction for which your personal information was collected. If we deny your request to delete, we will let you know the reason why.
- **Right to Non-Discrimination.** If you choose to exercise any of these rights, we will not discriminate against you in any way.

If you, or your authorized agent, would like to make a request to know or request to delete, contact us at [+1-833-960-0068](tel:+18339600068), or email your agent or coverholder who handled this insurance or email the address under “Contact Us” below.

We will take steps to verify your identity before processing your request to know or request to delete. We will not fulfil your request unless you have provided sufficient information for us to reasonably verify that you are the individual about whom we collected personal information. We may request additional information about you so that we can verify your identity. We will only use additional personal information you provide to verify your identity and to process your request.

You may use an authorized agent to submit a request to know or a request to delete. When we verify your agent’s request, we may verify both your and your agent’s identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your personal information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf. You may also make a consumer request on behalf of your minor child.

CONTACTING US

If you have any questions or concerns about this CCPA Privacy Policy or would like to learn more about how we protect your privacy, please either contact the agent or coverholder through whom you purchased this insurance policy or email us at dataprotection@bellandclements.co.uk.