

# PRIVACY POLICY NOTICE

**Last Updated:** February 1, 2025

This Privacy Notice explains how [PCF Insurance Services of the West, LLC, including its affiliates,] (collectively “**Company**”, “**we**”, “**us**” or “**our**”) collects, uses, discloses, and otherwise processes personal information (as defined below) in connection with our websites (the “**Sites**”) and other websites we own and operate that link to this Privacy Notice, and the related content, platform, services, products, and other functionality offered on or through our services (collectively, the “**Services**”). It does not address our privacy practices relating to job applicants, employees and other personnel.

## I. WHAT IS PERSONAL INFORMATION?

When we use the term “personal information” in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. It does not include aggregated or deidentified information that is maintained in a form that cannot reasonably be used to infer information about, or otherwise be linked to, a particular individual. Where we maintain deidentified data, we will maintain and use the data in deidentified form and not attempt to reidentify the data except as required or permitted by law.

## II. OUR COLLECTION AND USE OF PERSONAL INFORMATION

### Personal Information Collected from You

We may collect the following categories personal information submitted to us by individuals through the Services:

- **Contact Information**, including your name, phone number, and email address. We use this information to fulfill your request, to communicate with you directly, and to send you marketing communications in accordance with your preferences.
- **Demographic Information**, such as gender and marital status.
- **Identification Numbers**, such as your social security number or driver’s license number.
- **Account Information**, including first and last name, company name, employer, job title, business email address, user ID and password, profile information, affiliations, account balances, payment and purchase history information, and any other information you provide to us. We use this information to administer your account, provide you with the relevant service and information, communicate with you regarding your account and your use of the Service, and for customer support purposes. Please note we utilize a third-party provider to process payments on our behalf and do not accept payment directly through our Services.
- **Payment Information**. If you sign up for one of our Services requiring payment, we collect the information provided in connection with such payment (e.g., routing and account number, wire transfer information details). Please note that we may use third party payment processors, Stripe to process credit card payments made to us. As such, we do not retain any personally identifiable financial information in connection with credit card payments, such as credit card numbers. Rather, all such information is provided directly by you to our third-party processor. The payment processor’s use of your personal information is governed by their privacy notice. [To view Stripe’s privacy policy, please click-https://stripe.com/privacy:](https://stripe.com/privacy)

- **Inquiry and Communications Information**, including information provided in custom messages sent through the forms, in chat messages, to one of our email addresses, or via phone. This also includes contact information provided on our Services. We use this information to investigate and respond to your inquiries, and to communicate with you, to enhance the services we offer to our users and to manage and grow our organization.
- **Newsletter, Marketing Emails, and Blog Information**, including email address and applicable interests and communication preferences. We use this information to manage our communications with you and send you information about products and services we think may be of interest to you. If you wish to stop receiving email messages from us, simply click the “unsubscribe link” provided at the bottom of the email communication. Note that you cannot unsubscribe from certain services-related email communications (e.g., account verification, confirmations of transactions, technical or legal notices).
- **Surveys, Contests, Sweepstakes and Promotional Information**, including information provided in any questions submitted through surveys, or content of any testimonials. If you fill out any forms or participate in Company surveys, contests, sweepstakes, or other promotional events, we may collect your contact information (such as your name, email, and phone number, postal code), your Demographic Information, and any other information requested on the form, at sign up, or a part of your competition entry, including photos/videos (each, as applicable). On occasion, we may also collect your shipping and billing information, such as if you are a competition winner or purchase our products or services (where available). If you are part of our event or promotion partner, we may also collect your personal information including your name, company email, and company address.
- **Feedback Information**. We may also collect feedback and ratings you provide relating to our services or products. We use this information to communicate with you, to conduct market research, inform our marketing and advertising activities and improve and grow our business.
- **Business Representative Contact Information**. If you are a business representative, we collect your information in connection with the performance of the agreement or potential agreement with us. This information may include your first name, last name, company contact information (e.g., email, phone, address), job title, and any other information related to the performance of the agreement with us.
- **Other Information to Provide Our Services**. We may collect other categories of personal information to help secure insurance products or otherwise provide our Services, including motor vehicle driving records, credit history and credit scores, income and other financial information, and information about current or previous claims, which may include health data.

### **Personal Information Automatically**

As is true of many digital properties, we and our third-party partners may automatically collect certain information from or in connection with your device when visiting or interacting with our Services, such as the list below and in the sub-sections here:

- **Log Data**, including internet protocol (IP) address, operating system, device type and version, browser type and version, browser id, the URL entered and the referring page/campaign, date/time of visit, other user agent string data, the time spent on our Services, and any errors that may occur during the visit to our Services. Log data may overlap with the other categories of data below.
- **Analytics data**, including the electronic path you take to our services, through our services and when exiting our services, UTM source, as well as your usage and activity on our services, such as the time zone, activity information (first and last active date and time), usage history (flows created, campaigns scheduled,

emails opened, total log-ins) as well as the pages, links, objects, products and benefits you view, click or otherwise interact with. We may also analyze the interaction between you and your customer using our Services.

- **Location data**, such as general geographic location that we or our third-party providers may derive from your IP address.

We and our third-party providers may use (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, location-identifying technologies and logging technologies (collectively, "cookies") to automatically collect this personal information. We may also use this information to distinguish you from other users of our Services. This helps us monitor and analyze how you use and interact with our Services. It also helps us and our partners to determine products and services that may be of interest to you. For more information about these practices and your choices regarding cookies, please see the [Control Over Your Information](#) section below.

### **Personal Information from Third Parties**

We may also obtain personal information from third parties; which we often combine with personal information we collect either automatically or directly from an individual.

We may receive the same categories of personal information as described above from the following third parties:

- **Company Entities:** We may receive personal information from other companies and brands owned or controlled by Company, and other companies owned by or under common ownership as Company.
- **Your Employer / Company:** If you interact with our Services through your employer or company, we may receive your information from your employer or company, including another representative of your employer or company.
- **Social Media:** When an individual interacts with our Services through various social media networks, such as when someone follows us or shares our content on Google, LinkedIn, or other social networks, we may receive some information about individuals that they permit the social network to share with third parties. The data we receive is dependent upon an individual's privacy settings with the social network, and may include your profile information, profile picture, username, user ID associated with your social media account, and any other information you permit the social network to share with third parties. Individuals should always review and, if necessary, adjust their privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services. We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.
- **Service Providers:** Our service providers that perform services solely on our behalf, such as survey and marketing providers and payment processors, may collect personal information and often share some or all of this information with us. The information may include contact information, demographic information, payment information, information about your communications and related activities, and information about your orders. We may use this information to administer and facilitate our services, your orders, and our marketing activities.
- **Business Partners:** We may receive your information from our business partners, such credit and consumer reporting agencies. We may use this information to administer and facilitate our services.
- **Information we receive from authentication services you connect to our Service:** Some parts of our Service may allow you to login through a third party authentication service such as Facebook or Google.

These services will authenticate your identity and provide you the option to share certain personal information with us, which could include your name, email address, address book and contacts, or other information. The data we receive is dependent on that third party's policies and your privacy settings on that third-party site. We may use this information to operate, maintain, and provide to you the features and functionality of the Service. We may also send you service-related emails or messages (e.g., account verification, purchase confirmation, customer support, changes, or updates to features of the Site, technical and security notices).

- **Other Sources:** We may also collect personal information about individuals that we do not otherwise have from other sources, such as referral sources and lead generators, credit and consumer reporting agencies, publicly available sources, brand partnerships, or through transactions such as mergers and acquisitions. We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.

Through the provision of our Services, we may also process deidentified information that cannot reasonably be used to infer information about, or otherwise be linked to, a particular consumer or household. Company commits to maintain and use the information in deidentified form and will not attempt to reidentify the information, except in instances where necessary for determining whether the deidentification process used by Company satisfies the requirements under applicable law.

#### **Additional Uses of Personal Information**

We may use personal information we collect to:

- Fulfill or meet the reason the information was provided, such as to fulfill our contractual obligations and to deliver the Services you have requested;
- Manage our organization and its day-to-day operations;
- Process and submit information for obtaining insurance policies;
- Process, complete, and maintain records on transactions;
- Schedule, manage and keep track of appointments;
- Complete property appraisals;
- Maintain records of when you decline a service or sale;
- Verify your identity and entitlement to products or Services, when you contact us or access our Services;
- Communicate with individuals, including via email, text message, social media;
- Request individuals to complete surveys about our organization, organizations we partner with, and Services;
- For marketing and advertising purposes, including to market to you or offer updates on products or services we think that you may be interested in through email, direct mail, phone or text message (where applicable, we may send you marketing messages if you have given us your consent to do so or where we have relied on the soft opt-in rule);
- Administer, improve and personalize our Services, including by recognizing an individual and remembering their information when they return to our Services;
- Facilitate customer benefits and services, including customer support;

- Identify and analyze how individuals use our Services;
- Conduct research and analytics on our customer and user base and our Services;
- Improve and customize our Services to address the needs and interests of our user base and other individuals we interact with;
- Test, enhance, update and monitor the Services, or diagnose or fix technology problems;
- Help maintain the safety, security and integrity of our property and Services, technology assets and business;
- To enforce our [Terms of Use](#), to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- Prevent, investigate or provide notice of fraud or unlawful or criminal activity;
- Comply with contractual and legal obligations and requirements;
- To fulfill any other purpose for which you provide personal information; and
- For any other lawful purpose, or other purpose that you consent to.

Where you choose to contact us, we may need additional information to fulfill the request or respond to inquiries. We may provide you with additional privacy-related information where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Privacy Notice. In that case, the additional privacy notice will govern how we may process the information provided at that time.

### III. OUR DISCLOSURE OF PERSONAL INFORMATION

We may also share, transmit, disclose, grant access to, make available, and provide personal information with and to the following third parties:

- **Company Entities:** We may share personal information with other companies owned or controlled by Company, and other companies owned by or under common ownership as Company, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns, particularly when we collaborate in providing the Services.
- **Premium Financing Companies:** We engage with premium financing companies to help determine and arrange tailored financing solutions.
- **Insurance Providers and Claims Administrators:** We work with insurance companies and claims administrators to provide you with the insurance products made available through our Services and help process claims on insurance policies.
- **Service Providers:** We may engage third-party service providers that perform business or operational services for us or on our behalf, such as customer service, website hosting, infrastructure provisioning, IT services, analytics services, payment processing services, and administrative services.
- **Ad Networks and Advertising Partners:** We work with third-party ad networks and advertising partners to deliver advertising and personalized content on our Services, on other websites and services, and across other devices. These parties may collect information directly from a browser or device when an individual visits our Services through cookies or other data collection technologies. This information is used to provide and inform targeted advertising, as well as to provide advertising-related services such as reporting,

attribution, analytics and market research. Please see the [Third-Party Data Collection and Online Advertising](#) section for more information.

- **Business Partners:** From time to time, we may share personal data with our business partners to provide you with our products and services.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal information to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy or receivership.
- **Legal Obligations and Rights:** We may disclose personal information to third parties, such as legal advisors and law enforcement:
  - in connection with the establishment, exercise, or defense of legal claims;
  - to comply with laws or to respond to lawful requests and legal process;
  - to protect our rights and property and the rights and property of others, including to enforce our agreements and policies;
  - to detect, suppress, or prevent fraud;
  - to protect the health and safety of us and others; or
  - as otherwise required by applicable law.
- **With Your Consent:** We may disclose personal information about an individual to certain other third parties or publicly with their consent or direction.

#### IV. THIRD-PARTY DATA COLLECTION AND ONLINE ADVERTISING

We may participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements based on your browsing history. We permit third party online advertising networks, social media companies and other third-party services, to collect information about your use of our online services over time so that they may play or display ads on our Services, on other websites or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through tracking technologies, such as cookies, web beacons, embedded scripts, location-identifying technologies, and similar technology, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the Sites, AdID, precise geolocation and other information. We may share a common account identifier (such as a hashed email address or user ID) with our third-party advertising partners to help identify you across devices. We and our third-party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research. We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on such platforms. We may do this by providing a hashed version of your email address or other information to the platform provider.

Please see [Online Ads](#) of the [Control Over Your Information](#) section below to learn how you can opt out of interest-based advertising.

We may engage in the following:

- **Social Media Platforms.** We may display targeted advertising to you through social media platforms, such as LinkedIn, and other social media forums. These companies have interest-based advertising programs that allow us to direct advertisements to users who have shown interest in our services while those users are on the social media platform, or to groups of other users who share similar traits, such as likely commercial interests and demographics. We may share a unique identifier, such as a user ID or hashed email address, with these platform providers or they may collect information from our website visitors through a first-party pixel, in order to direct targeted advertising to you or to a custom audience on the social media platform. These advertisements are governed by the privacy policies of those social media companies that provide them. If you do not want to receive targeted ads on your social networks, you may be able to adjust your advertising preferences through your settings on those networks.
- **Third Party Partners.** We work with a variety of third-party partners to provide advertising services. For example, we use Google Analytics to recognize you and link the devices you use when you visit our Services on your browser or mobile device, log in to your account on our Services, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the service. Google Analytics allows us to better understand how our users interact with our Services and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google's website, "How Google uses information from sites or apps that use our services" located at <https://policies.google.com/technologies/partner-sites>. You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Ad-On here: <https://tools.google.com/dlpage/gaoptout/>.

We may also utilize certain forms of display advertising and other advanced features through Google Analytics. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to the Services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>.

For more information about these practices and your choices regarding cookies, please see the **Control Over Your Information** section below.

## V. CONTROL OVER YOUR INFORMATION

You may control your information in the following ways:

- **Email Communications Preferences.** You can stop receiving promotional email communications from us by clicking on the "unsubscribe" link provided in such communications. You may not opt-out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the Services, technical and security notices).
- **Mobile Information.** Mobile information will not be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. For more information, see our **Terms and Conditions**.

- **Modifying or Deleting Your Information.** If you have any questions about reviewing, modifying, or deleting your information, you can contact us directly at [commercial@andreini.com](mailto:commercial@andreini.com). We may not be able to modify or delete your information in all circumstances.
- **Cookies:** For information about our and our third-party partners' use of cookies and related technologies to collect information automatically, and any choices you may have in relation to cookies, please see the **Personal Information Automatically Collected** section above.
- **Online Ads:** To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Digital Advertising Alliance's (DAA) resources and/or the Network Advertising Initiative's (NAI) online resources, at [www.aboutads.info/choices](http://www.aboutads.info/choices) or <http://www.networkadvertising.org/choices/>. You may also be able to limit interest-based advertising through the settings menu on your mobile device by selecting "limit ad tracking" (iOS) or "opt-out of interest-based ads" (Android). You may also be able to opt-out of some — but not all — interest-based advertising served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app.

Please note that when you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on our online services. It means that the online ads that you do see from DAA program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, third parties may still use cookies to collect information about your use of our online services, including for analytics and fraud prevention as well as any other purpose permitted under the DAA's Principles.

## VI. DATA RETENTION

We will usually store the personal information we collect about you for no longer than necessary to fulfil the purposes for which it was collected, and in accordance with our legitimate business interests and applicable law. However, if necessary, we may retain personal data for longer periods of time, until set retention periods and deadlines expire, for instance where we are required to do so in accordance with legal, tax and accounting requirements set by a legislature, regulator or other government authority.

To determine the appropriate duration of the retention of personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting and other applicable obligations.

Once retention of the personal data is no longer necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if this is not possible (for example, because personal data has been stored in backup archives), then we will securely store the personal data and isolate it from further processing until deletion or deidentification is possible.

## VII. CHILDREN'S PERSONAL INFORMATION

Our Services are not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 16. If an individual is under the age of 16, they should not use our Services or otherwise provide us with any personal information either directly or by other means. If a child under the age of 16 has provided personal information to us, we encourage the child's parent or guardian to contact us to request that we remove the personal information from our systems. If we learn that any personal information we collect has been provided by a child under the age of 16, we will promptly delete that personal information.



## VIII. LINKS TO THIRD-PARTY WEBSITES OR SERVICES

Our Services may include links to third-party websites, plug-ins and applications (e.g., Zywave). Except where we post, link to or expressly adopt or refer to this Privacy Notice, this Privacy Notice does not apply to, and we are not responsible for, any personal information practices of third-party websites and online services or the practices of other third parties. To learn about the personal information practices of third parties, please visit their respective privacy notices.

## IX. UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the date at the beginning of this Privacy Notice. If we make material changes to this Privacy Notice, we will notify individuals by email to their registered email address, by prominent posting on our Services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided.

## X. CONTACT US

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to [commercial@andreini.com](mailto:commercial@andreini.com).

## XI. U.S. STATE PRIVACY DISCLOSURES

We may choose or be required by law to provide different or additional information relating to the processing of personal information about residents of certain countries, regions or states.

- **California:** If you are a California Resident, please click **here** for additional California-specific privacy information.
- **Nevada:** If you are a resident of the State of Nevada, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. Although we do not currently sell covered information, please contact us at [commercial@andreini.com](mailto:commercial@andreini.com).

## Additional California Privacy Disclosures

These Additional California Privacy Disclosures (“**Disclosures**”) supplement the information contained in our [Privacy Notice](#) and applies solely to individual residents of the State of California.

These Disclosures describe how we collect, use, disclose, and otherwise process personal information of individual residents of the State of California, either online or offline, within the scope of the California Consumer Privacy Act (“**CCPA**”), as amended by the California Privacy Rights Act. For a detailed description of how we collect, use, disclose, and otherwise process personal information in connection with our Services, please visit our [Privacy Notice](#). Unless otherwise expressly stated, all terms in these disclosures have the same meaning as defined in our [Privacy Notice](#) or as otherwise defined in the CCPA.

### COLLECTION AND USE OF PERSONAL INFORMATION

We may collect personal information from and about consumers for the purpose of obtaining insurance quotes and policies on your behalf. To learn more about the types of personal information we collect, the sources from which we collect or receive personal information, and the purposes for which we use this information, please refer to our [Privacy Notice](#).

In the last 12 months, we may have collected the following categories of personal information:

- **Identifiers**, such as your name, email address, phone number, social security number, driver’s license number, and date of birth;
- **Customer Record Information**, such as your Motor Vehicle Records, credit card or EFT information for insurance premiums and mortgage loan numbers;
- **Protected Classifications**, such as your gender and marital status;
- **Internet/Network Information**, such as device information, logs and analytics data;
- **Geolocation Data**, such as your approximate location based upon your IP address; and
- **Inferences**, such as information generated from your interactions with us reflecting predictions about your interests and preferences.

In the last 12 months, we may have collected the following categories of sensitive personal information

- **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;**
- **Health Information.**

We may collect this information from a variety of sources, including: publicly available resources, directly from you, from our referral sources and lead generators, from credit and consumer reporting agencies, from your browser or device when you use our Services, from your employer or organization, or from third parties that you permit to share information with us.

We may use the personal information we collect about you to:

- Process and submit information for obtaining insurance policies.
- Process, complete, and maintain records on transactions.

- Schedule, manage and keep track of customer appointments.
- Complete property appraisals of customer's properties.
- Maintain records of when customers decline a service or sale.
- Respond to consumer inquiries, including request for information, customer support online, phone calls.
- Detect security incidents.
- Debug, identify, and repair errors that impair existing intended functionality of our website.
- Improve user experience on our website.
- Protect against malicious or illegal activity and prosecute those responsible.
- Verify and respond to consumer requests.
- Prevent identity theft.

We may also process deidentified information that cannot reasonably be used to infer information about, or otherwise be linked to, a particular consumer or household. Company commits to maintain and use the information in deidentified form and will not attempt to reidentify the information, except in instances where necessary for determining whether the deidentification process used by Company satisfies the requirements under applicable law.

### **DISCLOSURE OF PERSONAL INFORMATION**

As described in the “**Our Disclosure of Personal Information**” section of our [Privacy Notice](#), we may share personal information with third parties to put into effect, administer, or enforce your insurance policies or transactions.

The categories of third parties to whom we may disclose your personal information for a business purpose may include: (i) premium financing companies; (ii) insurance companies and claims administrators; (iii) our service providers and advisors; (iv) other brands and affiliates in our family of companies; (v) lienholders, mortgagees, or other persons or entities with a legal or beneficial interest; (vi) legal advisors, law enforcement, or government agencies as required by applicable law; and (vii) analytics providers.

In the previous 12 months, we may have disclosed all of the categories of personal information we collect, explained in the “**Our Collection and Use of Personal Information**” section of these Disclosures, to third parties to put into effect, administer, or enforce your insurance policies or transactions.

### **SENSITIVE PERSONAL INFORMATION**

In the last 12 months, we have collected the following categories of sensitive personal information:

- **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;** and
- **Health Information.**

The Company only uses or discloses sensitive personal information for the following purposes, where such use or disclosure is necessary and proportionate for those purposes: for performing services you have requested, for detecting security incidents, fraud and other illegal actions, to ensure the physical safety of natural persons, to perform services on behalf of the business (where the sensitive information is reasonably necessary and

proportionate for this purpose), or for short term transient use. The Company only collects and processes sensitive information without the purpose of inferring characteristics about a consumer.

We use and disclose this sensitive personal information for the purposes described in the “**Our Collection and Use of Personal Information**” and “**Our Disclosure of Personal Information**” sections of these Disclosures. For more information, please see our [Privacy Notice](#).

## YOUR CALIFORNIA PRIVACY RIGHTS

As a California resident, you may be able to exercise the following rights in relation to the personal information that we have collected about you (subject to certain limitations at law):

<p><b>The Right to Access/Know</b></p>	<p>You have the right to request any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity:</p> <ul style="list-style-type: none"> <li>• The specific pieces of personal information we have collected about you;</li> <li>• The categories of personal information we have collected about you;</li> <li>• The categories of sources of the personal information;</li> <li>• The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;</li> <li>• The categories of personal information we have sold or shared about you (if any), and the categories of third parties to whom the information was sold or shared; and</li> <li>• The business or commercial purposes for collecting or, if applicable, selling or sharing the personal information.</li> </ul>
<p><b>The Right to Request Deletion</b></p>	<p>You have the right to request the deletion of personal information we have collected from you, subject to certain exceptions.</p>
<p><b>The Right to Correction</b></p>	<p>You have the right to request that any inaccuracies in your personal data be corrected, taking into account the nature of the personal data and the purposes of the processing of the consumer’s personal data.</p>
<p><b>The Right to Opt Out of Sales or Sharing of Personal Information</b></p>	<p>You have the right to direct us not to sell or share personal information we have collected about you to third parties now or in the future.</p> <p>If you are under the age of 16, you have the right to opt in, or to have a parent or guardian opt in on your behalf, to such sales or sharing.</p>
<p><b>Right to Limit Use and Disclosure of Sensitive Personal Information</b></p>	<p>You may have the right to direct us to limit the use of your sensitive personal information to certain purposes, including to perform the services or provide</p>

	the goods reasonably by an average consumer who requests those goods or services.
<b>The Right to Non-Discrimination</b>	You have the right not to receive discriminatory treatment for exercising these rights. However, please note that if the exercise of these rights limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our products and services or engage with you in the same manner.
<b>“Shine the Light”</b>	California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California’s “Shine the Light” law (Civ. Code §1798.83).

**HOW TO EXERCISE YOUR CALIFORNIA CONSUMER RIGHTS**

***To Exercise Your Right to Access / Portability, Right to Know, Right to Deletion, Right to Correction, or Right to Opt Out of Profiling***

Please submit a request by either:

- Completing our [Consumer Rights Request Form](#); or
- Emailing us at [commercial@andreini.com](mailto:commercial@andreini.com) with the subject line, “California Rights Request,”
- Calling 1-800-969-2522.

Before processing your request, we will need to verify your identity and confirm you are a resident of the State of California. In order to verify your identity, we will generally either require the successful authentication of your account, or the matching of sufficient information you provide us to the information we maintain about you in our systems. This process may require us to request additional personal information from you, including, but not limited to, your address, email address, and phone number.

In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.

***To Exercise Your Right to Opt Out of Personal Information Sales or Sharing for Targeted Advertising***

As is common practice among companies that operate online, we permit third party advertising networks, social media companies and other third party businesses to collect and disclose your personal information (including preferences, geolocation, commercial information and internet, network and device information) directly from your browser or device through cookies or tracking technologies when you visit or interact with our websites, use our apps or otherwise engage with us. These third parties use this information for the purposes of serving ads that are more relevant, for ad campaign measurement and analytics, and for fraud detection and reporting and may sell that information to other businesses for advertising and other purposes. By visiting [here](#), you can opt out from sales of this type of personal information by businesses that participate in the opt-out tool. To make opt-out requests related to mobile apps on your device for businesses participating in the DAA’s CCPA App-based Opt-Out Tool, you can download the appropriate app at <https://www.privacyrights.info/>.

To exercise the Right to Opt-Out of personal information sharing or selling for targeted advertising purposes, you may also submit a request by clicking on the following link:

**DO NOT SHARE OR SELL MY PERSONAL INFORMATION**

***Authorized Agents***

In certain circumstances, you are permitted to use an authorized agent (as that term is defined by the CCPA) to submit requests on your behalf through the designated methods set forth in these Disclosures where we can verify the authorized agent's authority to act on your behalf.

For requests to know, delete, or correct personal information, we require the following for verification purposes:

- (a) a power of attorney valid under the laws of California from you or your authorized agent; or
- (b) sufficient evidence to show that you have:
  - 1. provided the authorized agent signed permission to act on your behalf; and
  - 2. verified your own identity directly with us pursuant to the instructions set forth in these Disclosures; or directly confirmed with us that you provided the authorized agent permission to submit the request on your behalf.

For requests to opt-out of personal information "sales" or "sharing", we require a signed permission demonstrating your authorized agent has been authorized by you to act on your behalf.

***Minors***

We do not sell the personal information and do not have actual knowledge that we sell the personal information of minors under 16 years of age. Please contact us at [commercial@andreini.com](mailto:commercial@andreini.com) to inform us if you, or your minor child, are under the age of 16.

**SHINE THE LIGHT DISCLOSURE**

The California "Shine the Light" law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.