



Superior Access Insurance Services PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THIS SITE.

1. Overview

This Privacy Policy describes the policies of Superior Access Insurance Services ("**SAIS**", "we", "us", "our") regarding the collection, use, disclosure, and protection of information that you provide on this website <https://www.superioraccess.com> (the "**Site**").

SAIS understands how important the privacy of personally identifiable information is to the users of our website ("**Users**"). This Privacy Policy will tell you what information we collect about you and about your use of the Site and its services. It will explain the choices you have about how your personally identifiable information is used and how we protect that information. We urge you to read this Privacy Policy carefully. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

We reserve the right, at our discretion, to change this Privacy Policy at any time, which change will be effective 10 days following the modification. Your continued use of our Site following the posting of changes to these terms means you accept these changes. If you do not agree to this Privacy Policy, as modified from time to time, please do not visit or use the Site.

2. Information SAIS Collects and How SAIS Collects It

For the purpose of this Privacy Policy:

"Personally Identifiable Information" means any information that may be used to identify an individual, including, but not limited to postal address, telephone number, fax number and e-mail address, and also may include certain business information, such as employer name, occupation, job function, job title and the list of insurance companies you will be communicating via the Site.

"De-identified Information" means information which does not enable identification of an individual user or household, such as aggregated information about the use of our Site and its services.

If you choose to register with the Site for certain services (such as insurance products and services), we require you to submit information on your behalf or on behalf of any third party that may include Personally Identifiable Information. You represent and warrant that you have the necessary rights and authorizations to submit, use and authorize SAIS to use such third party Personally Identifiable Information. SAIS may also collect through its services electronic data or information that you submitted to an insurer and that you receive from an insurer and/or any third party (“**Third Party Data**”). SAIS logs information about your transactions performed via the Site. This information includes, but not limited to, the following events:

- Logons and logoffs;
- Transmissions of quotes and policies to insurance carriers;
- Communication errors;
- Business rule validation failures.

The Site only collects Personally Identifiable Information and Third-Party Data as described in this Privacy Policy. You are responsible for ensuring the accuracy of the Personally Identifiable Information, De-identified Information and Third-Party Data you submit via the Site. Inaccurate information will affect the information you receive when using the Site and tools and SAIS's and the insurers' ability to contact you as contemplated in this Privacy Policy. For example, your email address should be kept current because that it is how we communicate with you.

| Specific Personally Identifiable Information we collect | Source | Why is the Personally Identifiable Information collected and for what purposes? | Third parties with whom we share Personally Identifiable Information | Consequences of not providing the Personally Identifiable Information |
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| When you browse or visit our Site | | | | |
| Cookies, IP address, analytic tools and log files. | Your web browser | Analytics, statistics, to improve our Site. | Third party platforms: <ul style="list-style-type: none"> • Google Analytics • Cloudflare services | Any cookies deleted during a quote interview may have unforeseen results, including having to restart the interview process. |
| When you make use of, or interact with, our Site | | | | |
| When you submit a quote (for consumer) | | | | |
| Online interview: refer to section 12 – “California Consumer Privacy Act” for a list of field categories used. | <ul style="list-style-type: none"> • Your answers to interview questions. • Additional information provided by third party vendors for the purpose of pre-filling forms and double-checking details and information provided by you. | <ul style="list-style-type: none"> • To process the information. • To facilitate your requests for insurance quotes and insurance products. • To customize your experience. • To send you marketing and follow-up communications. | We provide Personally Identifiable Information to our subsidiaries and affiliated companies, third party vendors (e.g., insurances companies) and service providers, for the purpose processing and providing you with an insurance quote. | <p>Cannot process the information.</p> <p>Cannot facilitate your requests for insurance quotes and insurance products.</p> <p>Cannot customize your experience.</p> <p>Cannot send you marketing communications.</p> |

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| Offline interview (call center); refer to section 12 – “California Consumer Privacy Act” for a list of field categories used. | <ul style="list-style-type: none"> Your answers to interview questions. Additional information provided by third party vendors for the purpose of pre-filling forms and double-checking details and information provided by you. | <ul style="list-style-type: none"> To process the information. To facilitate your requests for insurance quotes and insurance products. To customize your experience. To send you marketing and follow-up communications. | We provide Personally Identifiable Information to our subsidiaries and affiliated companies, third party vendors (e.g., insurances companies) and service providers, for the purpose processing and providing you with an insurance quote. | <p>Cannot process the information.</p> <p>Cannot facilitate your requests for insurance quotes and insurance products.</p> <p>Cannot customize your experience.</p> <p>Cannot send you marketing communications.</p> |
| When you contact us | | | | |
| <ul style="list-style-type: none"> Full name Email address Phone number Comments Any other information that you provide/ supply to us | <ul style="list-style-type: none"> Information provided by you during the call, emails that you send to us, through the website, and any other way that you decide to contact us. | <ul style="list-style-type: none"> To answer your query. To assist you with your relevant problems. To contact you, and to identify and authenticate your access to the Site’s services that you are authorized to access. To improve our services to you. To customize your experience. To send you marketing communications | We provide Personally Identifiable Information to our subsidiaries and affiliated companies, third party vendors (e.g., insurances companies) and service providers, for the purpose of processing and providing answers to your queries | <p>Cannot answer your query</p> <p>Cannot assist you with your problems</p> <p>Cannot contact you, and to identify and authenticate your access to the Site’s services that you are authorized to access.</p> <p>Cannot improve our services to you.</p> <p>Cannot customize your experience</p> <p>Cannot send you marketing communications</p> |
| When you engage with our services | | | | |
| Information that would enable us to provide you with the service, including, | Information provided by you during offline Interview or via the | <ul style="list-style-type: none"> To fulfill any orders for services or | We provide Personally Identifiable Information to our subsidiaries and affiliated companies, | Cannot fulfill any orders for services or products made by you. |

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| <p>but not limited to:</p> <ul style="list-style-type: none"> • Method of payment • Full name • Email address • Phone number • Address <p>For more information, please refer to section 12 – “California Consumer Privacy Act” for a list of field categories used.</p> | <p>Site</p> <p>Additional information provided by third party vendors for the purpose of pre-filling forms and double-checking details and information provided by you.</p> | <p>products made by you.</p> <ul style="list-style-type: none"> • To track transactions conducted by you on our Site. • We may send you e-mail service notifications that are related to your account(s) or products and services in which you are enrolled. These include e-mails that provide account information, answer your questions about a product or service, facilitate or confirm a sale, or fulfill a legal or regulatory disclosure requirement. | <p>third party vendors (e.g., insurances companies) and service providers (e.g., insurances companies, LexisNexis), for the purpose of allowing you to engage with us</p> | <p>Cannot track transactions conducted by you on our Site.</p> <p>Cannot send you e-mail service notifications that are related to your account(s) or products and services in which you are enrolled.</p> <p>These include e-mails that provide account information, answer your questions about a product or service, facilitate or confirm a sale, or fulfill a legal or regulatory disclosure requirement.</p> |
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When you participate in a survey

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| <ul style="list-style-type: none"> • Full name • Email address • Phone number • Answers to the survey | <p>Information provided by you to our third-party survey provider</p> | <ul style="list-style-type: none"> • To allow you to participate in the sweepstakes and/or survey. • For business data to improve our services | <p>Third party platforms such as Survey Monkey for the purposes of conducting the survey, storing data, and processing responses.</p> | <p>Cannot allow you to participate in the survey.</p> <p>No consequences for not participating.</p> |
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When you attend a marketing event and provide us with Personally Identifiable Information

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| <p>First name Last name Email address Phone Number City, State Link to your quote</p> <p>Any other information that you decide to provide/supply us</p> | <p>Via a third-party email provider API</p> | <ul style="list-style-type: none"> • To establish a business connection • For quote and follow-up sales purposes | <p>Third party platforms such as for the purposes of collecting and storing contact information, coordinating marketing campaigns and/or sending emails,</p> | <p>Cannot establish a business connection</p> |
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When we acquire Personally Identifiable Information from third-party sources (such as lead-generation companies)

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| <p>Contact details (e.g., name and email address)</p> | <p><u>Customer Information:</u> Information</p> | <ul style="list-style-type: none"> • To send you more information about our software | <p>Third party platforms such as Discovery Data for the purposes of</p> | <p>Cannot send you more information about our</p> |
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| For Customers Customer name Policy number Premium | provided by your interview questions when getting a quote | products and services or offerings <ul style="list-style-type: none"> To establish a business relationship | collating and providing lead generation. | software products and services or offerings Cannot establish a business relationship |
| For Agents Business email Personal email Name Address Phone number(s) Number of States licensed in | Agent Information: subscription to Discovery Data | | | |

Finally, please note that some Personally Identifiable Information will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personally Identifiable Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may de-identify Personally Identifiable Information. We may use De-identified Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

3. Cookies and Other Tracking Technologies

Some of our Site pages utilize "cookies" and other tracking technologies. A "cookie" is a small text file that may be used, for example, to collect information about Site activity. Some cookies and other technologies may serve to recall Personally Identifiable Information previously provided by a Site user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

We collect and analyze traffic on our Site by keeping track of the IP addresses of our visitors. IP addresses are unique numeric identifiers that are assigned to each computer browser accessing the Internet.

We work with (or may in the future work with) network analytics service providers and other vendors to provide us with information regarding traffic on the Site, including pages viewed and the actions taken when visiting the Site; to provide us with information regarding the use of the Site. Our service providers may collect certain information about your visits to and activity on the Site as well as other websites or services, they may set and access their own tracking technologies on your device (including cookies and web beacons), and may use that information to show you targeted advertisements. Some of these parties may collect Personal Identifiable Information when you visit the Site or other online websites and services. We may also share certain De-Identified Information with these parties, including Hashed Information, in connection with the services they provide to us.

- Cloudflare services.** Refer to the additional privacy policy details per <https://www.cloudflare.com/privacypolicy/>. Cloudflare collects IP addresses, system configuration information, and other information.
- Netlify services.** Refer to the additional privacy policy details per <https://www.netlify.com/privacy/>. Netlify collects IP addresses, system configuration information, and other information.
- Google Analytics.** The Website uses a tool called "Google Analytics" to collect information

about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with other Personally Identifiable Information we collect. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

- We reserve the right to use additional analytic tools.

4. SAIS Disclosure of Your Information

SAIS will not disclose Personally Identifiable Information to any Third-Party Data to anyone outside of SAIS, except as described in this section.

- **De-identified Information.** We may use De-identified Information to improve our services and enhance your experience with the Site and its services. SAIS may disclose De-identified Information to advertisers, content and service providers, and other affiliated and unaffiliated companies.
- **Insurance Carriers.** An insurance carrier and/or an independent insurance agency appointed by an insurance carrier will use Personally Identifiable Information and Third-Party Data in combination with other information you provide about your insurance needs for the purpose of obtaining a quote. Ratings criteria vary between participating providers, with each carrier placing emphasis on particular items of information you provide. Please Note: Third party insurance carriers have their own privacy policies and we are not responsible for these policies nor the products and/or services offered by third party providers so please make sure to review the privacy policy of any third party carrier from whom you may purchase a policy.
- **Financial, Credit and Government Agencies.** In order to provide you with our services, and only where permitted by law, we may share Personally Identifiable Information you submitted with: (1) certified credit bureaus to verify information about your credit report; and (2) government agencies to verify your previous claims history and other relevant information. Your Personally Identifiable Information is maintained by credit agencies and disclosed by them to others as permitted by law.
- **Service Providers.** Sometimes third-party service providers are retained or utilized by us and may have access to our users' Personally Identifiable Information for the purpose of processing such information on our behalf. We require that these parties agree to process such information in compliance with our Privacy Policy, and we use reasonable commercial efforts to limit their use of such information and to use other appropriate confidentiality and security measures.
- **Business Partners and Affiliates.** We may provide Personally Identifiable Information to business partners with whom we jointly offer products or services. We may also share Personally Identifiable Information with our affiliated companies.
- **Advertising Partners.** Through our services, we may allow third party advertising partners to set technologies and other tracking tools to collect information regarding your activities

and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We may also combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising”. We may allow access to other data collected by the services to share information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer not to share your Personally Identifiable Information with third party advertising partners, you may follow the instructions below.

- **Others.** We may disclose Personally Identifiable Information you submitted (including Third Party Data) if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to i) comply with any applicable law, regulation, legal process or governmental request, ii) enforce our Terms and Conditions including investigations of potential violations thereof, iii) detect, prevent, or otherwise address fraud, security or technical issues, iv) protect against harm to the rights, property or safety of SAIS, its users, yourself or the public; v) investigate reports of visitors providing false or misleading information; vi) prevent or investigate reports of credit card fraud or unauthorized use; or (vii) protect against misuse or unauthorized use of our Site and/or service.

5. In the Event of Merger, Sale, or Bankruptcy

In the event that SAIS is acquired by or merged with a third party entity, we reserve the right, in any of these circumstances, to transfer or assign to such third party entity the information we have collected from our users as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your Personally Identifiable Information and Third Party Data is treated, transferred, or used.

6. Security

We maintain physical, electronic, and procedural safeguards that are designed to control and protect Personally Identifiable Information from unauthorized access. We monitor our systems to prevent unauthorized attempts at intrusion. We review our policies and practices, monitor our computer networks, and test the strength of our security in order to help us ensure the safety of customer information. We adhere to accepted industry privacy standards and comply with our own privacy practices.

We have implemented technical, organizational and security measures designed to protect your data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us, please make sure to take appropriate measures to protect this information.

If you have any questions about the security of our Site, you can send an email to ccpainquiry@superioraccess.com or call 1-800-216-4171.

7. Our Employees.

We restrict access to nonpublic Personally Identifiable Information about you to those employees whom we have determined need to know that information to provide products or services to you.

8. Links to Other Sites and Collection of Information by Third Parties

The Site contains links to other sites. Once you enter another web site (whether through an advertisement,

service, or content link), be aware that SAIS is not responsible for the privacy practices of such other sites. We encourage you to look for and review the privacy statements of each and every web site that you visit through a link or advertisement on the Site.

Our Site may use a third party to present or serve advertisements that you may see at our Site. These third party ad servers may use cookies, web beacons, clear gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness.

9. Who Should Use Our Site?

Our Site is for insurance products and services and is not intended for children. We offer insurance products and services and thus do not market any products or services to children under the age of thirteen or knowingly collect any information from children under the age of thirteen. If we become aware that information is or has been submitted by or collected from a child under the age of thirteen, we will delete this information.

10. Your Choices

You have certain choices about your Personally Identifiable Information. Where you have consented to the processing of your Personally Identifiable Information, you may withdraw that consent at any time and prevent further processing by contacting us as described below. Even if you opt out, we may still collect and use non-Personally Identifiable Information regarding your activities on our services and for other legal purposes as described above.

“Do Not Track.” Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

Marketing emails – opt-out: You may choose not to receive marketing email of this type by sending a single email with the subject "BLOCK" to ccpainquiry@superioraccess.com. Please note that the email must come from the email account you wish to block.

11. Your Privacy Rights

In accordance with applicable law, you may have the right to request:

- **Access and/or an Electronic Copy of your Personally Identifiable Information.**
- **Correction of or Change to Your Personally Identifiable Information.** You can access the quote information you provided and update it at any point during the Interview by navigating to previous pages and making the necessary changes. Upon completing the Interview, but as long as you have not yet purchased a policy, you can revise information you provided during the interview by going to the relevant data entry screen through the top progress bar or by using the “BACK” button. After you have revised the information, proceed forward to get a revised quote reflecting the changes you have made.
- **Deletion of your Personally Identifiable Information.**
- **Restriction of or Object to processing of your Personally Identifiable Information,** including the right to opt in or opt out of sale of your Personally Identifiable Information to third parties, if applicable, where such requests are permitted by law.

If you would like to exercise any of these rights, you can send an email to ccpainquiry@superioraccess.com or call 1-800-216-4171.

While we cannot guarantee privacy perfection, we will address any issue to the best of our ability

as soon as possible. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

12. California Consumer Privacy Act

This Privacy Notice for California Residents supplements and is expressly made part of the information contained in this policy, and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (CCPA). Any terms defined in the CCPA have the same meaning when used in this Notice.

SAIS, including its website, collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, our websites and agents, have collected the following categories of personal information from consumers within the last twelve (12) months:

| Category | Examples | Collected Y/N |
|--|---|---------------|
| Identifiers. | Valid name, postal address, IP address, email address, SSN, driver's license. FEIN, Social Security Number or other similar identifiers. | Yes |
| Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | Valid name, signature, Social Security Number, 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, health insurance information. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories. | Yes |
| Protected classification characteristics under California or federal law. | Age, marital status, sex (including gender, gender identity, gender expression, veteran or military status, | Yes |
| Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | Yes |
| Biometric information. | Physiological, biological, or behavioral, characteristics (including DNA) that can be used to establish individual identity, or imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template such as a faceprint, a minutiae template, or a voiceprint, can be extracted and keystroke patterns or rhythms, gait patterns, or rhythms, and sleep, health or exercise data that contain identifying information. | No |
| Internet or other electronic network activity. | Information on a consumer's interaction with SAIS website and application. | Yes |
| Geolocation data. | Physical location | Yes |
| Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | No |
| Professional or employment-related information. | Current or past job history or performance evaluations. | No |
| Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g, 34 | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student | No |

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| C.F.R. Part 99)). | disciplinary records. | |
| Inferences drawn from other personal information to create a profile about a consumer. | Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | No |

SAIS obtains these categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Site(s).
- From third-party business partners, such as LexisNexis, who provide data services available in the public domain.

Non-Discrimination

If you decide to exercise your rights, you will not receive any discriminatory treatment by us for the exercise of the privacy rights conferred by the CCPA. However, note that some features of our website, our products and/or our services will not function without your Personal Information. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

SALE OF PERSONAL INFORMATION. DISCLOSURE OF PERSONAL INFORMATION FOR BUSINESS PURPOSES. FINANCIAL INCENTIVES FOR COLLECTION OF PERSONAL INFORMATION

We do not sell any personal information and we do not disclose any personal information for any business purpose. Therefore, we have not sold or disclosed consumers' personal information for a business purpose in the preceding 12 months.

List of Independent Service Provider Categories

- Data prefill vendors
- Survey providers
- Email providers
- Data analytics providers
- Cloud providers
- WP Engine providers
- Lead Generation providers
- Insurance Carriers
- Business Customers
- External Contractors
- Log storage and monitoring

Last updated: May 13, 2020.

