



## PRIVACY NOTICE DISCLOSURE FOR CALIFORNIA RESIDENTS

This Privacy Notice Disclosure for California Residents (“Privacy Disclosure”) applies to personal information of California residents only to the extent the information is subject to the California Consumer Privacy Act of 2018 (CCPA). This Privacy Disclosure has been adopted to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA) and its implementing regulations (collectively, the “CCPA”). It does not apply to personal information collected, used or disclosed pursuant to (i) the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act; (ii) certain medical and health information covered by HIPAA; or (iii) any other personal information exempted by the CCPA. It also does not apply to employees, contractors, or job applicants. Any terms defined in the CCPA have the same meaning when used in this Privacy Disclosure.

For purposes of this Privacy Disclosure, “Vanliner,” “we,” and “us” means Vanliner Insurance Company.

### **Personal Information We Collect**

#### *Categories of Personal Information We Collect*

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). We may collect the following categories of your personal information:

| Category of Personal Information   | Examples   |
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| Identifiers<br>(“Identifiers”)   | Name, alias, postal address, social security number, unique personal identifier, online identifier, email address, account name, driver’s license number, passport number, or other similar identifiers.   |
| Personal Information Described in the California Customer Records statute (Cal. Civ. Code 1798.80(e)) (“Other PI”) | Real name, signature, social security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, employment, employment history, bank account number, or any other financial information or health information. Some personal information included in this category may overlap with other categories. |

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| Characteristics of protected classifications under California or federal law (“Characteristics”) | Age, race, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy, or childbirth and related conditions), sexual orientation, and veteran or military status. Some personal information included in this category may overlap with other categories.   |
| Commercial Information (“Commercial”)  | Records of personal property, products or services purchased, obtained or considered.  |
| Internet or other electronic network activity information (“Internet Activity”)                  | Browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement.  |
| Geolocation data (“Geolocation”)   | Physical location and/or movements.  |
| Sensory data (“Sensory”)   | Audio, electronic, visual, or similar information.   |
| Professional or employment-related information (“Professional”)                                  | Current and/or past employment history, professional licenses or affiliations. Education records for maintaining continuing education requirements.  |
| Inferences drawn from other personal information (“Inferences”)                                  | Information used to create a profile about a consumer reflecting the consumer’s characteristics or behavior, such as driving behaviors or account transactions.  |
| Sensitive Personal Information (“Sensitive”)   | Personal information that reveals your social security number, driver’s license, state identification card, or passport number; your racial or ethnic origin; the contents of your email or text messages, unless we were the intended recipients of the communication; personal information collected and analyzed concerning your health. Some personal information included in this category may overlap with other categories. |

## *Sources of Personal Information*

We may obtain the following categories of personal information from the following categories of sources:

| <b>Category of Personal Information</b> | <b>Sources</b>   |
|---|--|
| All Categories                          | <ul style="list-style-type: none"> <li>• Indirectly. For example, from information collected from an agent, broker, personal representative, group, employer, annuity contract owner or throughout the course of processing sales and/or providing services.</li> <li>• Directly and indirectly from activity on our website, other Vanliner websites, or mobile apps. For example, from submissions you make, when you access our portals, and/or from website details collected automatically when you access our website.</li> <li>• From third parties that interact with us in connection with the products and/or services we provide. For example, from another financial institution when soliciting business on our behalf, service providers who assist us with providing or improving our products or services, or service providers who assist us with fraud detection or compliance with government regulations or laws.</li> </ul> |
| All Categories except Inferences        | <ul style="list-style-type: none"> <li>• Directly from you. For example, from forms you complete and/or products or services you purchase.</li> </ul>  |
| Identifiers and Internet Activity       | <ul style="list-style-type: none"> <li>• Through tracking technologies when you access and use our website, including cookies, browser fingerprinting, and location identifying technologies. See our <a href="#">Cookie Policy</a> for more information on how we use cookies.</li> </ul>   |

We do not sell your personal information. We also do not share your personal information for cross-context behavioral advertising purposes.

## Uses and Disclosures of Personal Information

### *Business or Commercial Uses of Personal Information*

We may use all of the categories of personal information for the following commercial or business purposes:

| Category of Personal Information | Purposes  |
|----------------------------------|---|
| All Categories                   | <ul style="list-style-type: none"><li>• To underwrite and issue, maintain, and renew insurance policies, bonds or warranty products, obtain reinsurance, and communicate information to you throughout this process. We process this information to enter into and perform our contractual obligations to you and for our legitimate business purposes.</li><li>• To process, adjust, and administer claims under an insurance policy, bond, or warranty contract and to communicate with you throughout the process. We process this information to perform our contractual obligations to you and for our legitimate business purposes.</li><li>• To collect premium payment, collect purchase payments, collect reinsurance proceeds, purchase reinsurance, pay insurance claims, pay third-party service providers and other payees, and to make other business-related payments. We process this information to perform our contractual obligations to you and for our legitimate business purposes.</li><li>• To fulfill or meet the reason you provided the information; to respond to your inquiries, including to investigate and address your concerns; and to monitor and improve our response(s). We process this information to enter into and perform our contractual obligations to you, for our legitimate business purposes, and to comply with legal obligations and exercise any legal rights we may have.</li><li>• To market to you; and to provide you with alerts or other notices, concerning our products, services, payments, events, or news that may be of interest to you; and to communicate important information regarding our policies, terms and conditions and other administrative information.</li></ul> |

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|  | <p>We process this information for our legitimate business purposes, to perform contractual obligations to you, and to comply with legal obligations and exercise any legal rights we may have.</p> <ul style="list-style-type: none"><li>• To help maintain the safety, security, and integrity of our website, products and services, databases and other technology and information assets; for business continuity and disaster recovery, and to create, maintain, customize, and secure your account with us. We process this information to perform our contractual obligations to you, for our legitimate business purposes, to secure your information, and to comply with legal obligations and exercise any legal rights we may have.</li><li>• For testing, research, analysis, and product development, including actuarial studies, analytics, and statistical modeling; to develop, personalize, and improve our website and products and services. We process this information for our legitimate business purposes, to provide and customize our products and services to you, and to secure your information.</li><li>• To respond to law enforcement, regulatory, or other legal requests; to prevent and detect fraud, to comply with legal, regulatory, or contractual obligations; to comply with internal policies and procedures; to respond to and resolve complaints (including consumer complaints); for financial, claim, or other audits; to establish and defend Vanliner’s legal rights; and as necessary or appropriate to protect the rights, property or safety of our clients or others. We process this information for our legitimate business purpose, to perform contractual obligations to you, to secure your information, and to comply with legal obligations and exercise any legal rights we may have.</li><li>• To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred. We process this information for our</li></ul> |
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|  | <p>legitimate business purpose, to comply with legal obligations and exercise any legal rights we may have.</p> <ul style="list-style-type: none"> <li>• For other internal business operations, such as to service your account; to manage commercial risk, and for quality assurance measures. We process this information for our legitimate business purpose, to perform contractual obligations to you, and to comply with legal obligations and exercise any legal rights we may have</li> </ul> |
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*Nonaffiliated Parties with Whom Personal Information is Disclosed*

We may disclose the following consumers’ personal information to the following categories of nonaffiliated parties:

| Category of Personal Information | Nonaffiliated Parties  |
|----------------------------------|--|
| All Categories                   | <ul style="list-style-type: none"> <li>• Service providers, such as IT vendors, developers, software providers, website hosting providers, data analytics companies, market research companies, and other service providers in order to provide products and services and to support our business operations.</li> <li>• Our Insurance-related business partners and service providers, such as brokers, agents, advisors, adjusters, claims administrators, insurance support organizations, reinsurers, other insurance companies, financial institutions, consumer reporting agencies, in order to provide products and services and to support our business operations.</li> <li>• Government agencies, our regulators, judicial bodies or other parties in response to a legal process (such as a subpoena), to protect the rights of our Company or others, or as otherwise required or allowed by law.</li> <li>• Nonaffiliated parties in connection with a proposed or actual reorganization, merger, sale, joint venture,</li> </ul> |

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|  | assignment, transfer or other disposition of all or a portion of our business assets or stock. |
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## **Your Privacy Rights**

The CCPA provides California residents, or a person registered with the California Secretary of State that a California resident authorizes to act on their behalf (“authorized agent”), with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights and how to make a verifiable request.

Only you, or your authorized agent, may make a request described below related to your personal information. You may make a request on behalf of your minor child.

We cannot respond to your request or provide you with personal information, however, if we cannot (i) verify your identity or authority to make the request, and (ii) confirm the personal information relates to you. To make a verifiable request, you must:

1. provide sufficient information to allow us to reasonably verify you are the person about whom we collected personal information or that you are the person authorized to make the request. If you are an authorized agent, you also will be required to provide proof that you are authorized to make the request, such as by providing a copy of the written permission from the person on whose behalf you are making the request; and
2. describe your request with sufficient detail that allows us to properly understand, evaluate, and respond.

We will only use personal information you provide to verify your identity or authority to make the request. Making a verifiable request does not require you to create an account with us.

### *Right to Know and Access Your Information*

You have the right to request that we disclose to you:

- 1) the categories of personal information we have collected about you;
- 2) the categories of sources from which we collect your personal information;
- 3) the business or commercial purposes for collecting or disclosing your personal information;
- 4) the categories of third parties with whom we disclose your personal information;
- 5) the categories of personal information we have disclosed about you for a business purpose; and
- 6) the specific pieces of personal information we have collected about you.

To request any of these disclosures, you or your authorized agent may:

1. call us at **1-866-723-3149** or
2. visit [www.gaig.com](http://www.gaig.com) and select the privacy link at the bottom of our webpage.

You may make up to two (2) requests in any twelve (12) month period.

### *Right to Request Deletion*

You have the right to request that we delete your personal information. To make a deletion request, you or your authorized agent, may:

1. call us at **1-866-723-3149** or
2. visit [www.gaig.com](http://www.gaig.com) and select the privacy link at the bottom of our webpage.

You should be aware, however, that California law allows us to retain your personal information under certain conditions, even if you have asked us to delete it. We, therefore, may deny your deletion request if, for example, retaining the information is necessary for us or our service provider(s), including, but not limited to, for any of the following reasons:

1. to complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. to help to ensure security and integrity to the extent the use of the personal information is reasonably necessary and proportionate for those purposes; or
3. to comply with a legal obligation.

We will promptly consider all deletion requests. In addition, we will notify you of any denial of your deletion request and the reason for such denial.

### *Right to Correct*

You have the right to request that we correct any inaccurate personal information we maintain about you. To request a correction of your inaccurate personal information, you or authorized agent may:

1. call us at **1-866-723-3149** or
2. visit [www.gaig.com](http://www.gaig.com) and select the privacy link at the bottom of our webpage.

We will promptly consider all correction requests. In addition, we will notify you of any denial of your correction request and the reason for such denial.

### *Right to Non-discrimination for the Exercise of Consumer Privacy Rights*

We will not discriminate against you because you have chosen to exercise any of your privacy rights described above.

## **Contact**

If you have questions about this notice, please contact us at:

Phone: **1-866-723-3149**  
Email: [CCPA@gaig.com](mailto:CCPA@gaig.com)  
Address: Great American Insurance Group  
Attn: PDC – CCPA; DTN6  
301 E. Fourth Street  
Cincinnati, OH 45202

## **Changes to this Privacy Disclosure**

This Privacy Disclosure may be changed from time to time. We will post any changes on our website ([www.vanliner.com/Home/PrivacyPolicy](http://www.vanliner.com/Home/PrivacyPolicy)). The date noted on the Privacy Disclosure indicates when it was last revised.