



CopperPoint  
Alaska National  
PacificComp

## COPPERPOINT INSURANCE COMPANIES

### **PRIVACY NOTICE**

This notice is provided by the CopperPoint family of companies that includes CopperPoint Insurance Company, Alaska National Insurance Company, Pacific Compensation Insurance Company and their affiliated companies.

This notice is intended to comply with the California Consumer Privacy Act of 2018 (“CCPA”) for information we collect that’s subject to the CCPA and shall become effective on January 1, 2020. This notice does not apply to information collected pursuant to other privacy laws that is exempt under the CCPA, including information collected under the federal Gramm-Leach-Bliley Act (“GLBA”) and its implementing regulations or the California Financial Information Privacy Act.

If your information has been collected in connection with any transaction involving an insurance claim, insurance application or insurance policy related matter, your rights are covered under the GLBA and its implementing regulations and not under the CCPA. Accordingly, please refer to our separate GLBA privacy notice, which may have been sent separately by mail and is available on our website or through any of the other options listed at the end of this notice.

The CopperPoint family of companies values your privacy and strives to comply with various laws and regulations protecting nonpublic personal information that we collect about you, which is more fully described in Part 1, below (“Personal Information”). Depending in part upon where you reside and/or the nature of your business with us, these federal and state legal protections will include the federal Gramm-Leach-Bliley Act (GLBA), the California Consumer Privacy Act of 2018 (CCPA) and the California Insurance Information and Privacy Protection Act (IIPPA). If you are a California resident, this notice is to inform you of our privacy policies and practices applicable to your Personal Information collected under the CCPA. Although you’re not required to reply to this notice, please read it carefully to understand your rights and what we do with your information.

#### **Summary Statement:**

The CopperPoint family of companies will not collect or disclose your Personal Information in a manner that is unlawful or contrary to this notice or discriminate against you for exercising any of your privacy rights.

#### **General Policy Statement:**

We need to collect and share Personal Information about you to run our business and to provide the services you expect from us. In so doing, we undertake to protect the confidentiality and security of your information. This includes protecting it against unauthorized use or access through various, industry standard security features and limiting authorized access to persons and organizations based upon business need. We do not sell your Personal Information, including your financial information. And we do not share it with nonaffiliated third parties unless reasonably necessary to administer our insurance services, perform a related function, as permitted or required by law, or as otherwise described in this notice.

We will not prepare or request an investigative consumer report about you in connection with an application for insurance, a policy renewal, a policy reinstatement or a change in insurance benefits without separately notifying you. We will not use illegal or unethical means to collect information about you, including the use of pretext interviews. For example, we will not refuse to identify or misrepresent ourselves or the true purpose of an interview to acquire your information. But please note that this prohibition is not intended to hinder legitimate fraud investigation techniques. We will not intentionally collect information about you if you are a minor outside of information required or necessitated by an insurance transaction covered under the GLBA exemption.

Your rights regarding information we collect about you depends upon the type of information we collect, the purpose for which we collect it and your status as a consumer, customer, non-consumer/customer, employee, job applicant,

business partner, business prospect or other status type, as well as the jurisdiction in which you reside. This notice and our underlying policies and practices are not intended to create or bestow rights greater than or in addition to any rights you're entitled to under laws applicable in your resident jurisdiction. Laws, technologies and business demands change over time and, therefore, this notice is subject to change with them. The version date of this notice is printed on the bottom of each page for your ease of reference. This notice may also be supplemented by various, additional privacy policies that are sent separately or appear elsewhere, as applicable. For example, on our websites or at other points where we collect your information, either electronically or in person.

**Part 1: Categories of Personal Information We Collect, Use and Disclose**

We collect and disclose to third parties nonpublic information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual consumer or household, including you/yours, as outlined in the chart below (“Personal Information”). Personal information doesn't include information that is (i) publicly available from government sources or (ii) deidentified or aggregated. The types of individuals we collect Personal Information on include our policyholders, beneficiaries under our policies, those who apply to us for insurance coverage, those who might register to receive information from us, those who make inquiry to us and others.

We have collected and/or shared – but not sold – the following categories of your Personal Information within the last twelve (12) months from the sources identified below for the business and commercial purposes listed:

Categories and Examples of Personal Information We <u>DO</u> Collect	Sources of Info – See Part 2, Below	Purposes Used – See Part 3, Below	Shared with – See Part 4, Below
<p>(I) <u>Personal identifiers</u>: A real name, alias, signature, social security number, physical characteristics or description, address, email address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some Personal Information included in this category may overlap with other categories.</p>	A through I, inclusive.	1 through 17, inclusive.	a through i, inclusive.
<p>(II) <u>Personal characteristics of protected classifications under California or federal law</u>: Race, color, age (40 years and older), ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	A through I, inclusive.	1, 2, 5, 8, 9, 10, 12, 14, 15, 17	a through g, inclusive, and i.
<p>(III) <u>Commercial information</u>: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	A, B, C, D, I	1, 5, 8, 9, 10, 14, 15, 17	a, c, e, f, g, i
<p>(IV) <u>Internet or other electronic network activity information</u>: Browsing history, search history, IP address and information regarding a consumer's interaction with an internet website, application, or advertisement. (This category does not include information that is actively entered into an online form.)</p>	H	1, 2, 3, 4, 6, 7, 10, 12, 14	a, f, i

Categories and Examples of Personal Information We <u>DO</u> Collect	Sources of Info – See Part 2, Below	Purposes Used – See Part 3, Below	Shared with – See Part 4, Below
(V) <u>Sensory data and limited medical information</u> : Audio, electronic, visual, thermal, olfactory, or similar information. Also, limited medical information, including body temperature and symptoms. For example, the COVID-19 pandemic may require your temperature to be taken and/or you to disclose symptoms before attending company-sponsored events or entering the company’s premises.	A, C, D, H	1, 5, 8, 9, 10, 15, 17	a, c, d, e, f, g, i
(VI) <u>Professional or employment-related information</u> : Current and/or past employment history including performance evaluations.	A, C, D, E, G, I	5, 8, 10, 15, 17	a, c, d, e, f, g, i
(VII) <u>Non-public education information (as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99))</u> : Education records, files, documents, and other materials directly related to a student maintained by an educational agency or institution or by a person acting for such an agency or institution, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	C, D	1, 5, 8, 10, 15, 17	a, c, d, e, f, g, i
(VIII) <u>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</u> : A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.  Some Personal Information included in this category may overlap with other categories.	A through I, inclusive.	1 through 17, inclusive.	a through i, inclusive.

We have NOT collected or shared the following categories of your Personal Information within the last twelve (12) months:

Categories and Examples of Personal Information We <u>Do NOT</u> Collect
(IX) <u>Biometric information</u> : Physiological, biological or behavioral characteristics, including an individual’s deoxyribonucleic acid (DNA), 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.
(X) <u>Geolocation data</u> : Physical location and/or movements.
(XI) <u>Inferences drawn from other Personal Information</u> : Information used to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**PART 2: How We Collect Your Personal Information and Our Sources of Information**

The Personal Information we collect about you may come from the following types of sources using the following types of techniques, including:

- A. Person(s), including you, applying for insurance coverage in the process of completing an insurance application or from agents/brokers acting on their behalf and from public records. For example, we may record and retain the information that you send us through traditional, electronic or telephonic communications, including completing online forms;
- B. Consumer reporting agencies;
- C. Beneficiaries under our insurance policies, including you, from interviews, claim forms, workers' compensation applications and notices, medical records, tax records, public records, employers, investigators, surveillance audio/video and other third-party sources;
- D. Witnesses from interviews and investigations;
- E. Your treating physician or other healthcare providers upon request or pursuant to subpoena;
- F. Vendors and business partners from interviews, premium audits, contracts, public records and consumer reports;
- G. Employment records and personnel files upon request or pursuant to subpoena;
- H. Visitors, including you, to our live events from various means, including sign-in sheets or electronic attendance/registration rosters, or visits to and interactions with our websites either directly or through cookies or a link provided in an electronic communication using web counters or other technologies. Please note that third-party websites or applications that you choose to access through links on our websites may also collect information about you which is subject to their collection practices, which should be consulted before interacting with them;
- I. Other insurance institutions and insurance support organizations upon request or pursuant to subpoena.

**PART 3: Uses of Personal Information**

We do not sell your Personal Information and we will not collect it or use it contrary to this notice without further notice to you. We may use the categories of Personal Information referenced above for various purposes related to our business operations, including:

- 1) To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask questions about our services, we will use that Personal Information to respond to your inquiry. If you provide your Personal Information to purchase a product or service, we will use that information to process your payment and facilitate delivery of the product or service;
- 2) To facilitate the customer service experience, including personalized support and responding to your service inquiries, and to improve the quality of our operations. To provide you with information about our services that you may request from us or that we may be required to provide you;
- 3) To create, maintain, customize and secure your account with us, and to help maintain the safety security, and integrity of our website, products and services, databases and other technology assets, and business;
- 4) To guide our decision-making process when tailoring our service offerings or marketing efforts;
- 5) To process your claims, requests, purchases, transactions, payments, and to prevent transaction fraud;
- 6) To personalize your experience with us and to deliver content and service offerings relevant to your interests, including targeted offers and promotions through our website and other electronic and telephonic communications;
- 7) For testing, research, analysis, and product development, including to develop and improve our website, products and services;
- 8) To respond to law enforcement requests and as required by applicable laws, court order, or local, state or federal government regulations. For example, abandoned or unclaimed property (escheatment) laws and state insurance department information requests;
- 9) As necessary or appropriate to protect the rights, property, or safety of you, us, our clients, or others;
- 10) As described to you when collecting your Personal Information or as otherwise set forth in the applicable privacy laws of the jurisdictions within which we operate and you reside;
- 11) To evaluate or conduct financing, a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about you is among the assets transferred;

- 12) To verify your identity, process your registration, claim or application for any of our services, including verifying your information is accurate and valid;
- 13) To interact with insurance industry support organizations. For example, the Insurance Services Office, Inc. (ISO), that prepares reports pertaining to insurance transactions that may be retained by such organizations and disclosed to other persons without authorization and as a fraud identification tool;
- 14) For internal business purposes;
- 15) To defend or prosecute claims, including conducting investigations relating to insurance transactions.
- 16) To contact you with regard to your use of any of our services and, in our discretion, changes to any of our services and/or any of our services' policies.
- 17) For any lawful purpose that you have expressly authorized us to use it for.

#### **PART 4: Who We Share Information With**

When we share your Personal Information, we do so with the following categories of affiliates and nonaffiliated third parties:

- a) Service providers;
- b) Data aggregators and analytics providers;
- c) Government agencies, including law enforcement;
- d) Medical or healthcare service providers;
- e) Other insurance institutions and insurance industry support organizations, including reinsurers;
- f) Our affiliates;
- g) A suitor pursuant to a potential business transfer;
- h) Advertising or social media networks (to direct content to you only on our behalf, not theirs, as we do not sell your Personal Information to them for their own use);
- i) Any third-party upon your or your agent's written authorization or as required by law.

#### **PART 5: Your CCPA Privacy Rights**

Please note that we will retain a record of any requests made and processing performed under this part for a period of at least two years following the request to support our compliance and customer service obligations.

##### ***Right to Access/Request to Know:***

Under the CCPA, you have the right to request the Personal Information that we've collected, used or disclosed about you during the 12-month period preceding your request. We won't charge you a fee for exercising your privacy rights unless we determine that you have made manifestly unfounded or excessive requests, in which case, we're permitted by law to charge you a reasonable fee to cover our associated costs. You may make these requests up to twice within any 12-month period by visiting this website and completing an interactive CCPA webform or by calling this toll-free CCPA number and following the instructions provided:

**CCPA Toll-free Phone: 1-844-842-6674**

**CCPA Webform: [copperpointdsr.ethicspoint.com](https://copperpointdsr.ethicspoint.com)**

Please note that if your information has been collected in connection with any transaction involving an insurance claim, insurance application or insurance policy related matter, your rights are governed by the GLBA and its implementing regulations and not by the CCPA. If you make a CCPA request for Personal Information we collected for an insurance transaction, we will deny the CCPA request to such extent and notify you that we'll process the excepted portion of it under our GLBA policy. Our separate GLBA privacy notice is available on our website or through any of the other options listed at the end of this notice.

In order to make a CCPA request, you will be required to provide information sufficient to permit us to verify your identity to between a reasonable degree of certainty for personal information categories, and a reasonably high degree of certainty for specific pieces of personal information, meaning we must be able to successfully match at

least two (2) or more pieces of identifying information that we already maintain about you. The extent of the verification required will increase commensurate with the sensitivity of the information sought and the risk of harm posed by its potential unauthorized access or deletion. We may require two-factor authentication using a code sent either electronically or by carrier-delivered mail. Typically, will not require you to provide additional information for verification purposes beyond what we already have on record for you. However, if we cannot sufficiently verify your identity and/or the sensitivity of the information warrants it, we may request additional information, which will only be used for verification and security purposes and will be deleted once this need has expired. If we're required to verify your identity to a reasonably high degree of certainty, you may also be required to sign a declaration under penalty of perjury confirming your identity and request, which we will retain consistent with our record-keeping obligations.

We will acknowledge your CCPA information request within ten (10) days of receipt and provide you with information about how we will process the request, including the method for verifying your identity and authenticating the request. We will complete your request, to the extent permitted by law, within forty-five (45) days from its initial receipt. Please note that we may require an additional forty-five (45) days, for a total of ninety (90) days, from initial receipt to complete your request as needed. If this additional time is necessary, we will provide you with notice and an explanation of the reason it cannot be completed within the shorter timeframe.

A verifiable consumer request does not require you to create an account with us if you do not already have one. If you do maintain a password-protected account with us, we will require you to verify your identity through the existing authentication process established for your account. If we suspect fraudulent or malicious activity on the account, we will not comply with requests for information disclosures until further verification is successfully established. If we cannot successfully verify identity to the required level of certainty, we will deny requests to know specific pieces of personal information and provide notice of same. Without an account, you will still be required to properly identify yourself sufficient to permit us to verify your identity. This is for your protection so that persons not entitled to your information are not able to improperly obtain it through this process. Therefore, we cannot comply with your request or provide Personal Information to you if we suspect fraudulent activity, or if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

You, or someone legally authorized to act on your behalf, are the only ones authorized to make a verifiable consumer request for your Personal Information. While you may also make a verifiable consumer request on behalf of your minor child, we do not intentionally collect minors' information outside of information required or necessitated by an insurance transaction covered under the GLBA exemption, mentioned above.

In order to authorize your agent to make a request on your behalf, you must either (a) provide the agent with your power of attorney pursuant to California Probate Code sections 4000 to 4465 or (b) do all of the following: (1) provide the authorized agent written permission to do so; (2) the agent must submit proof that they have been authorized to act on your behalf; and (3) you must verify your own identity directly with us.

We're not permitted to disclose certain, high-value pieces of information that include social security numbers, driver's license numbers, other government-issued identification numbers, financial account numbers, health insurance or medical identification numbers, account passwords, or security questions and answers. And we're not permitted to provide other specific pieces of Personal Information if we determine that disclosure would create a substantial, articulable, and unreasonable risk to the security of the information, your account with us, or our systems or networks.

We'll advise if we're unable to verify a requestor's identity and won't disclose any specific pieces of Personal Information. In such instances, we may seek to limit our disclosure to the categories of Personal Information we've collected about you.

Please note that information relating to Category IV, "Internet or other electronic network activity information," above, is not typically capable of being associated with any particular consumer because the tracking technologies that we utilize only track the generic number of visitors to our website and do not permit us to identify individual visitors. However, if you visit our website by clicking on a link in a direct, electronic communication addressed to you, we are

able to ascertain your identity from our records on file and determine what website pages of ours you visited and when.

If we receive a “household” request, meaning a request pertaining to a group of people occupying a single dwelling, we will respond to the request, upon verification, by providing aggregate household information unless all consumers in the household jointly request access to specific pieces of information identifiable in our records, in which case, we will provide the specific information requested.

Please be advised that your rights may be subject to various exceptions and limitations, including information that is deemed legally privileged.

***Right to Deletion:***

Under the CCPA, you have the right to request that we delete your Personal Information. Because the right to delete is premised upon the right to access or know, in order to properly make a deletion request, you must qualify by meeting the same verification requirements as set forth above under the heading “Right to Access/Request to Know.” And you must make your request by following the same process, utilizing the same CCPA webform or toll-free phone number as referenced above, under the heading “Right to Access/Right to Know,” and specifically request that we delete your information.

If your information qualifies for deletion under this section, we will process the request as outlined and advise you within the timeframes as set forth above under the heading “Right to Access/Request to Know,” and specify the manner in which we have deleted your Personal Information. Before processing your request, we will utilize a two-step confirmation process, requiring you to confirm your initial deletion request before completing it. We may choose to aggregate or deidentify your information in lieu of deleting it, which will permanently and completely erase the information in our existing systems. Any copies stored on archived or back-up systems will be deleted when such systems are next accessed or used. Information that we’ve previously aggregated or deidentified is not subject to a deletion request.

As noted in the section above, if your information has been collected in connection with any transaction involving an insurance claim, insurance application or insurance policy related matter, your rights are covered under the GLBA and not the CCPA. If you make a CCPA request to delete Personal Information we collected relating to an insurance transaction, we will deny the CCPA request to such extent and notify you accordingly. Our separate GLBA privacy notice is available on our website or through any of the methods listed at the end of this notice.

Please be advised that your rights may be subject to various exceptions and limitations, including information that is deemed legally privileged, relates to your own insurance claim or civil or criminal proceeding, or is otherwise required to be maintained for legal, regulatory or business purposes. If we deny a request to delete in whole or in part, we will advise the legal basis for doing so.

***Right to Opt-Out of Sale of Information:***

Since we do not sell your Personal Information, you have no need or right to opt-out.

***Rights Involving Minors:***

We won’t intentionally collect the Personal Information of minors outside of information required or necessitated by an insurance transaction covered under the GLBA exemption.

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***Right Against Discrimination:***

You have the right to be free from discrimination for choosing to exercise any of your privacy rights described in this notice. And we will not engage in discrimination against you for exercising any of your privacy rights.

**Further Information:**

Please visit our website at **[www.copperpoint.com/legal-and-privacy](http://www.copperpoint.com/legal-and-privacy)** for further information about our privacy policies and practices and your rights under the CCPA and/or other privacy laws, including information on how this notice can be accessed in an alternative, ADA accessible format.

If you're a policyholder, please contact your insurance agent or broker to verify, make changes to, or request information about your policy or coverages.

If you're a claimant/beneficiary under one of our policies, please contact your claims examiner or our claims department to verify, make changes to, or request information about your claim(s).

If you have questions about this notice or wish to exercise rights available to you, including the right to submit a written request for access to your Personal Information on file with us please visit our website or contact us at:

**Toll-free Phone:**        **1-800-231-1363**

(Our office hours are 8 a.m. to 5 p.m. (MST), Monday through Friday, excluding holidays.)

**Website:**                **[www.copperpoint.com/contact-us](http://www.copperpoint.com/contact-us)**

**Email:**                    **[ask@copperpoint.com](mailto:ask@copperpoint.com)**

Please remember that this notice is subject to change and may be supplemented by various, additional privacy policies that are sent separately or appear elsewhere, including on our websites or delivered in person.