

# CALIFORNIA PRIVACY NOTICE

**Last Updated:** January 2023

This California Privacy Notice (Notice) applies to any of our companies (referred to hereinafter as "CFC," "we" or "our") that is defined as a "business" under the California Consumer Privacy Act. We are providing this Notice, which supplements our [Electronic Privacy Policy](https://www.cinfin.com/privacy-policy) (https://www.cinfin.com/privacy-policy), in accordance with our obligations under applicable law and as part of our belief that your personal information should be respected and protected. Please review this Notice to understand our privacy practices, including what personal information we collect, why we collect it, how we collect it, and how you can exercise your rights with respect to your personal information.

This Notice applies to California residents whose personal information CFC collects, including website and app users, job applicants, employees, contractors, and business-to-business (B2B) contacts. This Notice should be read in conjunction with any other privacy notices you receive from other CFC companies.

This Notice is not applicable to nonpublic personal information (as defined by the Gramm-Leach-Bliley Act) that we obtain from customers of CFC who purchased or are seeking to purchase financial service products primarily for personal, family or household use such as life insurance or homeowner insurance. This Notice also is not applicable to protected health information (as defined by the Health Insurance Portability and Accountability Act). Refer to our other [privacy notices](https://www.cinfin.com/privacy-policy) (https://www.cinfin.com/privacy-policy) for more information for how we process personal information in other contexts.

## 1. What Personal Information Does CFC Collect?

We collect personal information directly from you through your transactions with CFC and our business partners, and your interactions with us on our websites and social media pages. We also collect personal information from other sources such as publicly available databases, consumer reporting agencies, commercially available sources, individual businesses, service providers, and other sources authorized by you such as prior and current employers. The type of personal information we collect varies depending on your relationship with us, such as if you are a customer or a noncustomer filing a claim.

We collect the following categories of personal information:

- A. **Identifiers**, such as name, contact information, and online identifiers
  - For job applicants, employees, and contractors, this includes Social Security numbers and other government-issued ID numbers
  - For B2B relationships, this includes professional contact information
- B. **Personal information**, as defined in the California customer records law, such as insurance policy number and signature
  - For job applicants, employees, and contractors, this may include employment and education history, and medical information
- C. **Characteristics of protected classifications under California or federal law**, such as age and gender
  - For job applicants, employees, and contractors, this includes race, religion, national origin, disability, medical conditions and information, citizenship, immigration status and marital status
- D. **Commercial information**, such as customer transaction information and history
- E. **Internet or network activity information**, such as browsing history and interactions with our and other websites and systems
  - For job applicants, employees, and contractors, this includes information related to your use of CFC's information technology resources including company-provided devices

- For B2B relationships, such as agents, this includes information related to your use of CFC portals, technology, or devices
- F. **Geolocation data**, including your general location, such as city, determined through your IP address or device ID
  - For employees and contractors who drive certain company vehicles as part of their employment, this may include precise geolocation to track the vehicle while it is being used for job functions
- G. **Audio, electronic, visual, and similar information**, such as photographs or video recordings created in connection with our business activities, for example CCTV, security monitoring, and recordings of calls to our representatives and call centers
  - For job applicants, employees, and contractors, this includes electronic monitoring of your use of and access to CFC information technology resources
- H. **Professional or employment-related information**, such as current employer and professional contact information
  - For job applicants, employees, and contractors, this includes work history, prior employer, information relating to references, details of qualifications, skills and experience, and other information related to human resources administration
- I. **Sensitive information**, such as precise geolocation (see above), Social Security number, government-issued identifiers, and personal information that reveals racial or ethnic origin, religious or philosophical beliefs, or union membership
- J. **Inferences** drawn from any of the personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics

## 2. How Does CFC Use Personal Information?

Depending on your relationship with us, we may use the personal Information described above for the purposes such as:

- A. to operate, manage, and maintain our business, such as to make insurance decisions, communicate with you and others as part of our business, provide our products and services, and maintain records;
- B. to develop and improve our products and services, such as to undertake quality and safety assurance measures, audit customer interactions, facilitate social sharing functionality, resolve complaints, and evaluate customer service;
- C. for our employment and vendor management purposes;
- D. for security purposes, such as to maintain our facilities and infrastructure, protect against malicious, deceptive, or fraudulent activity, and conduct internal investigations;
- E. for monitoring purposes, such as to establish the existence of facts, maintain compliance with regulatory or self-regulatory practices, or for other purposes permissible under applicable law;
- F. to perform other necessary and appropriate internal functions, such as accounting and auditing;
- G. to conduct research, analytics, and data analysis, and for marketing purposes, such as to personalize, advertise, and market our products and services and administer contests and promotions, in accordance with applicable law; and
- H. to comply with legal and regulatory requirements, defend legal claims, and assist with legal processes such as investigations, regulatory requests, litigation, and arbitration.

## 3. How Does CFC Disclose Personal Information?

Depending on your relationship with us, we may disclose your personal information for the purposes described in Section 2 with the following categories of recipients: entities within the CFC family, including subsidiaries and affiliates; insurance and distribution parties; service providers; providers of internet-connected devices and associated software; governmental authorities and others involved in court action; parties to a merger or acquisition; and our business partners or others as may be required and where we have obtained the appropriate authorization.

We do not sell or share for cross-context behavioral advertising personal information, outside of the use of certain tracking technologies (such as cookies). In the *cinfin.com* footer, click Do Not Sell Or Share My Personal Information to manage your cookie preferences.

#### **4. What Are Your Privacy Rights?**

If you are a California resident and this Notice applies to you, you may request that we:

- A. Disclose to you the following information covering the 12 months preceding your request:
  - The categories of personal information we collected about you and the categories of sources from which we collected such personal information
  - The specific pieces of personal information we collected about you
  - The business or commercial purpose for collecting, selling, or sharing personal information about you
  - The categories of personal information about you that we otherwise disclosed, and the categories of third parties with whom we disclosed such personal information (if applicable)
  - The categories of personal information we sold or shared about you and the categories of third parties to which each category of personal information was sold or shared
- B. Delete personal information that we maintain about you, subject to certain exceptions
- C. Correct inaccurate personal information that we maintain about you

You also have the right to opt out of the sale or sharing (for cross-context behavioral advertising purposes) of your personal information. We do not sell or share personal information outside of the context of using certain tracking technologies (such as cookies). To opt out of such sales or sharing, in the *cinfin.com* footer, click Do Not Sell Or Share My Personal Information to manage your cookie preferences.

To make a privacy rights request, or to submit questions or concerns about our privacy policies and information practices, please contact us by calling us toll-free, 866-814-7585, or emailing us, [ConsumerRequest@cinfin.com](mailto:ConsumerRequest@cinfin.com). You may also use an authorized agent to make a request on your behalf. Requests are subject to our verification process, including you or your authorized representative providing certain identifying information.

Authorized representatives will be required to provide proof of their authority to act on your behalf. If an authorized representative submits a request on your behalf, we will contact you to confirm their representation.

If we are unable to verify your identity, or confirm that you have authorized the request, we may not be able to respond to your request in full.

Note that California residents have the right to limit the use and disclosure of your sensitive personal information for certain purposes. We do not use or disclose sensitive personal information for purposes that would trigger this right.

Under California law, you are entitled to exercise your rights without experiencing any discriminatory treatment.

#### **Changes to this Notice**

We may change or update this Notice from time to time. When we do, we will post the revised Notice on this page with a new "Last Updated" date.