

# Privacy Notice Disclosure for California Residents

**Last update: January 1, 2020**

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 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; or (ii) certain medical and health information covered by HIPAA. It also does not apply to employees, contractors, or job applicants. This Privacy Disclosure has been adopted to comply with the CCPA. Any terms defined in the CCPA have the same meaning when used in this Privacy Disclosure.

We collected the following categories of personal information within the last twelve (12) months.

## **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:

<b>Category of Personal Information</b>	<b>Examples</b>
Identifiers (“Identifiers”)	Name, alias, postal address, social security number, personal identifier, online identifier, email address, account name, driver’s license number, passport number, or other similar identifiers.
Personal Information Categories Listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)) (“Other PI”)	Name, signature, social security number, address, telephone number, passport number, driver’s license or state identification card number, annuity contract 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.
Characteristics of protected classifications under California or federal law (“Characteristics”)	Age, citizenship, marital status, medical condition, physical or mental disability, and sex.
Commercial Information (“Commercial”)	Records of personal property, products or services purchased, obtained or considered.
Biometric Information (“Biometric”)	Voice recordings from which a voiceprint can be extracted.
Internet or other electronic network activity information (“Internet Activity”)	Browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.
Geolocation data (“Geolocation”)	Physical location and/or movements.
Sensory data (“Sensory”)	Audio, electronic, visual, or similar information.

Category of Personal Information	Examples
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.

*Sources of Personal Information*

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

Category of Personal Information	Sources
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 (<a href="http://www.RepublicIndemnity.com">www.RepublicIndemnity.com</a>), other Great American Insurance Group member 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 Cookie Policy on <a href="http://www.RepublicIndemnity.com">www.RepublicIndemnity.com</a> for more information on how we use cookies.</li> </ul>

## 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:

<b>Category of Personal Information</b>	<b>Purposes</b>
All Categories	<ul style="list-style-type: none"> <li>• To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry.</li> <li>• To provide you with information, products, or services that you request from us.</li> <li>• To provide support, personalize, and develop our website, products, and services.</li> <li>• To create, maintain, customize, and secure your account with us.</li> <li>• To process requests for services, purchases, transactions, and payments, and to prevent transaction fraud. For example, if you share your name and contact information to request a quote or to obtain a product or service, we will use that information to process your request or to facilitate a payment. We also may save your personal information to facilitate new requests for products or services or to make payments.</li> <li>• To provide you with support and to respond to your inquiries, including to investigate and address your concerns, and to monitor and improve our response(s).</li> <li>• To provide you with alerts or other notices, including via electronic mail and/or text messages, concerning our products, services, payments, events, or news that may be of interest to you.</li> <li>• To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.</li> <li>• For testing, research, analysis, and product development, including to develop and improve our website, products and services.</li> <li>• To respond to law enforcement, regulatory, or other legal requests, to prevent and detect fraud, and to comply with laws or regulations.</li> <li>• As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.</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.</li> <li>• To process insurability with any of our products or services, including verifying your information is accurate and valid.</li> <li>• To contact you with regard to, in our discretion, changes to any of our services and/or any of our services' policies.</li> <li>• For internal business purposes.</li> </ul>

## *Third Parties with Whom Personal Information is Disclosed*

We may disclose the following consumers' personal information to the following categories of third parties:

<b>Category of Personal Information</b>	<b>Third Parties</b>
All Categories	<ul style="list-style-type: none"><li>• Service providers.</li><li>• Data aggregators.</li><li>• To our affiliates or pursuant to a business transfer.</li><li>• Government agencies or to protect the rights of our Company or others.</li></ul>
Identifiers and Internet Activity	<ul style="list-style-type: none"><li>• When you interact with third-party content on our website.</li></ul>

We do not sell your information.

## **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, 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.

### *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 share 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 someone legally authorized to act on your behalf ("authorized agent"), can:

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.

Only you, or your authorized agent, may make a request related to your personal information. You also 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.

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, can:

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.

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

We cannot respond to your deletion request, 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 were 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 deletion request does not require you to create an account with us.

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 detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. to comply with a legal obligation; or
4. otherwise use personal information, internally, in a manner compatible with the context in which you provided the information.

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 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.

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

Phone:           **1-866-723-3149**

Email:            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. The date noted on the Privacy Disclosure indicates when it was last revised.