

# Healthy Paws Privacy Policy

**Effective Date: 1/21/2025**

**Last Updated: 1/21/2025**

## Scope

This Privacy Policy ("**Policy**") describes how Healthy Paws, a Chubb Company, and its U.S.-based affiliates ("**Healthy Paws**," "**we**," "**our**," or "**us**") collect, uses, and discloses your information, including Personal Information, when you visit our websites, including [www.healthypawspetinsurance.com](http://www.healthypawspetinsurance.com) (the "**Sites**"), download our mobile application, or use any of our products or services that link to or otherwise reference this Policy (collectively, the "**Services**"). This policy does not apply to [www.chubb.com](http://www.chubb.com) nor to any non-Healthy Paws websites or mobile applications that you may access via the Services. Those websites and services are governed by the privacy policies that appear on those sites and applications. Depending on your relationship with us, you may receive other privacy notices from us providing additional detail about our privacy practices. If you are a California resident, please see the [Additional Notice to California Residents](#) below for more information.

Your use of the Services is subject to this Policy and the Healthy Paws [Terms and Conditions](#), including applicable terms of limitations on liability and the resolution of disputes.

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## Personal Information We Collect

We collect information that identifies, describes, or is reasonably capable of being associated with you ("**Personal Information**"). Personal Information does not include publicly available information, such as information lawfully made available from government records, information we have a reasonable basis to

believe is lawfully made available to the general public by you or by widely distributed media, or by a person to whom you have disclosed the information and not restricted it to a specific audience, or deidentified or aggregated information.

As described below, we collect Personal Information directly from you, automatically through your use of the Sites and Services, and from third-party sources. To the extent permitted by applicable law, we may combine the information we collect from publicly available or third-party sources. The Personal Information we collect varies based on your relationship with us.

### **Personal Information We Collect Directly From You**

In order to access certain Services, we may collect Personal Information directly from you, including throughout the quoting, application, or claims handling processes. The Personal Information you provide directly to us may include:

- **Identifiers and Contact Information.** We may collect personal identifiers and contact information such as your name, address, email address, phone number.
- **Government-Issued Identifiers.** We also may collect information such as your driver's license number, social security number, tax ID, or other government-issued identifiers.
- **Account Details.** If you register an account with us, we collect information such as your email, phone number, or user ID, and password used to login to your account.
- **Policy or Claims Information.** This includes policy information, claim information, including materials you submit as part of your claim, or other information you choose to provide us.
- **Commercial Information.** We may also collect information about the products, services, or coverage you purchase.
- **Payment Information.** If you pay a bill, we may collect information necessary to process your payment such as bank account information, billing address, and any other related information.
- **Message Contents.** We may collect your messages, email contents, or any other information you so choose to provide when interacting with our customer service or agents.
- **Audio or Similar Information.** If you speak with our customer service team by phone, we may collect a recording for quality assurance and training purposes.
- **Preferences.** We may also collect information about the types of Services you use, your communications preferences, wish lists and other preferences you may select in your account or profile.
- **Other Information.** We also collect information when you complete online forms, surveys, or leave us product reviews. We also collect any other information you so choose to provide.

### **Personal Information We Collect Automatically**

As described below in the "**Cookies and Other Tracking Mechanisms**" section, when you visit our Sites or use our Services, we may automatically collect certain Personal Information, including:

- **Device Identifiers.** We automatically collect IP address, unique device ID, device type, browser type, location information, and information about your browser and browser language.

- **Network Activity.** We may also collect information related to how you interact with the Services and advertisements, such as page views, links and items clicked and other activity information, referring URL, browsing history, and other similar information. We may use analytics providers and technologies, including cookies, session replay, and similar tools, to collect this information.
- **Geolocation.** We may also collect geolocation information, such as physical location or movements. Additionally, depending on your device settings, if you visit our Sites or use our mobile applications, we may collect geolocation information from your IP address which links to the region you live in.

### **Personal Information We Collect from Other Sources**

We may collect information about you from veterinary providers, or through our affiliates, business partners, and vendors, including from administrators, adjusters, agents, brokers, or other representatives who provide services or products on our behalf. For example, we may collect information about your policies, including coverage or claim information, through these sources. We may also receive information from publicly available sources.

### **How We Use Personal Information**

We may use the Personal Information we collect for the following purposes:

- **Operate Our Business.** We use the Personal Information we collect to allow you to maintain your account and otherwise run our day-to-day operations.
- **Provide You Products and Services.** We use the Personal Information we collect to provide you with, renew or modify products and services. We also use this information to maintain your coverage and memberships, including to set up a product or service, service your policy, change your policy, handle a claim, or complete a transaction.
- **Communicate With You.** We use the Personal Information we collect to communicate with you about your use of our Sites and Services, to respond to your inquiries, to provide you with the information and documents you request, and for other customer service purposes. We may also use this information to contact you about your account, or to send you necessary information directly related to the products or services you have requested or our newsletter.
- **Evaluate and Improve Our Products and Services.** We use the Personal Information we collect to evaluate, analyze, improve, and develop our products and Services, including this Site. We also use this information to tailor the content and information that we may send or display to you, to offer location customization and personalized help and instructions, and to otherwise personalize your experiences while using our Services.
- **Analytics Models to Support our Business.** We use the Personal Information we collect in analytics models, including actuarial, underwriting, claims, and loss control models, to facilitate and service our business (e.g., to create new products and features). We may also use this information to conduct actuarial or research studies to maintain and develop our products and Services, and to create new offerings or features. We also use this information to administer surveys and questionnaires, such as for market research or member satisfaction purposes.

- **Marketing and Advertising.** We may use your Personal Information for marketing and promotional purposes, including to send you promotional communications about products, services, features, and options we believe may interest you. We may send communications via e-mail, regular mail or may send push notifications via a mobile device. We may also use your information to serve you advertisements or customized content online.
- **Inferences.** We may use the information we collect to better understand how you access and use our Sites and the products and Services available on our Sites, both on an aggregated and individualized basis.
- **Find Locations on Request.** At your request, we may use your information to obtain your location from the mobile device or the network using your device's Global Positioning System (GPS) functionality, or directly from you. We may use your location information to help you search for information or provide our products or services. If you do not want location information used, you can disable the GPS functionality on your mobile device.
- **Fraud and Security Purposes.** We may use the Personal Information we collect to mitigate fraud and protect Healthy Paws and others. We also use this information to prevent and detect fraudulent, malicious, deceptive, infringements of our policies and contracts and other potential misuse of or illegal activity relating to our products, assets, and Services.
- **Legal Requirements.** We use the Personal Information we collect to investigate, enforce, and apply this Policy and our Terms and Conditions, and to otherwise protect our own rights and interests, such as to resolve any disputes or to respond to requests from law enforcement, court orders, regulators, or other legal processes.
- **Business Transfers.** We may also use the Personal Information we collect and receive to consider and implement mergers, acquisitions, reorganizations, refinancing, and other business transactions, and for the administration of our general business, accounting, recordkeeping, and other legal functions.
- **Other Operational and Business Purposes.** We may use your Personal Information for other operational purposes, including to refer you to our third-party partners as part of a referral program, to comply with contracts related to products or services that we provide to you.

We also may use automated processes and combine or aggregate any of the information we collect through the Services or elsewhere for any of these purposes or for analyzing usage statistics and trends.

### **How We May Disclose Personal Information**

When permitted by applicable law, including in cases that require your consent, we may disclose your Personal Information to our affiliates, business partners, vendors and services providers, and others as follows:

- **Affiliates and Business Partners.** We may disclose the Personal Information we collect with our affiliates, agents and brokers. Healthy Paws also partners with other businesses to offer products and services, and we may disclose your Personal Information to those organizations, including those that play a role in insurance transactions such as independent claims adjusters, and other

claims related companies. If required by law, we will obtain consent prior to disclosing Personal Information.

- **Vendors and Service Providers.** We may disclose the Personal Information we collect with vendors and service providers who perform functions on our behalf, such as helping complete transactions and process payments, handling claims, servicing your policy or membership, and engaging in credit reporting. We may also disclose your information to vendors and service providers who provide website hosting, automated processes and analytics, marketing and advertising, email or other communication services, development and research or actuarial studies, customer support, and tax, accounting, and legal services.
- **Marketing and Advertising Partners.** We may also disclose your Personal Information, such as name and contact information, with our marketing and advertising partners to send you content about certain products and Services.

We also may disclose your Personal Information in the following circumstances:

- **Business Transfers.** As we continue to develop our business, we may buy, merge, or partner with other companies. We may disclose Personal Information as part of those commercial transactions (e.g., mergers, acquisitions, financings, asset sales or transfers, bankruptcy or reorganization or other similar business transactions), as well as in contemplation of such transactions (e.g., due diligence). Where possible we will do so under appropriate confidentiality agreements. Similarly, if all or part of our business, assets, or Sites are merged with or sold to another company, or as part of a bankruptcy proceeding, your Personal Information may be transferred to the surviving or acquiring company.
- **In Response to Legal Process.** Personal Information may be disclosed to third parties, as required by law or subpoena, or if we reasonably believe such action is necessary to comply with the law and the reasonable requests of regulators, law enforcement or other public authorities. We also may disclose the information we collect in order to comply with a judicial proceeding, court order, or other legal process, including responding to national security or law enforcement disclosure requirements.
- **To Prevent Fraud and Protect Us and Others.** We also may disclose the Personal Information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy or our Terms and Conditions, or as evidence in litigation in which we are involved. We may also disclose Personal Information to protect our rights and the rights of others. This may include exchanging information with other companies and organizations for fraud prevention, spam/malware mitigation, and similar purposes.
- **Aggregate and De-Identified Information.** We may disclose aggregate or de-identified information about users with third parties for marketing, advertising, research, or other purposes.
- **With Your Permission.** We may disclose Personal Information in other ways not described above. If we do so, we will notify you and, if necessary, obtain your consent.

## **How We Collect and Use Social Security Numbers**

Healthy Paws may collect Social Security numbers ("SSNs") in the course of our business. We strive to protect the confidentiality and security of SSNs in our possession, custody or control by: (i) limiting access to SSNs and (ii) maintaining reasonable administrative, technical and physical safeguards to protect against the loss, misuse or unlawful disclosure of SSNs. We do not share SSNs for marketing purposes.

## **Cookies and Other Tracking Mechanisms**

We and our third-party service providers use cookies, pixels, tags, and other similar tracking mechanisms to automatically collect information about browsing activity, type of device and similar information within our Services and to target advertising and content across our Services and third-party sites and services. We use this information to, for example, analyze and understand how users access, use and interact with others through our Services, as well to identify and resolve bugs and errors in our Services and to assess, secure, protect, optimize and improve the performance of our Services.

***Cookies.*** "Cookies" are alphanumeric identifiers we transfer to your device's hard drive through your web browser for tracking purposes. Some cookies allow us to make it easier for you to navigate our Services, while others are used to enable a faster log-in process, support the security and performance of the Services, or allow us to track activity and usage data within our Service.

***Clear GIFs, Pixel Tags, and Other Technologies.*** In addition to cookies, we may also use pixel tags (sometimes called web beacons or "clear GIFs") to collect information about you and your use of our Services. While cookies are stored locally on your device, pixel tags are embedded invisibly within web pages and online content. We may use these, in connection with our Services to, among other things, track the activities of users, help us manage content and compile usage statistics. We may also use these in HTML e-mails we send, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded.

***Third-Party Analytics and Tools.*** We use third party tools, such as Google Analytics, which are operated by third party companies. These third-party analytics companies may collect usage data (using cookies, pixels and similar tools) about our Services in order to provide us with reports and metrics that help us evaluate usage of our Services, improve our Sites, and enhance performance and user experiences. To learn more about Google's privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

***Cross-Device Tracking.*** We and our third-party providers may use the information that we collect about you within our Services and on other third-party sites and services to help us and these third parties to identify other devices that you use (e.g., a mobile phone, tablet, other computer, etc.).

***Targeted Advertising.*** We work with third parties, such as ad networks, channel partners, mobile ad networks, analytics and measurement services and others ("Advertising Providers") to personalize content and display advertising within our Services. We and our Advertising Providers may use cookies, pixels tags, session replay and other tools to collect information within our Services such as IP address, location information, device ID, cookie and advertising IDs, and other identifiers, as well as browsing information

such as web pages, videos and other content accessed by you. We and our Advertising Providers use this information to provide you more relevant ads and content within our Services, and to evaluate the success of such ads and content.

**Do Not Track.** We do not currently respond to web browser "Do Not Track" signals.

## Your Cookie and Marketing Choices

We make available several ways for you to manage choices about your Personal Information, including preferences regarding cookies, advertising, whether you want to receive marketing and promotional emails from us, and choices regarding your account and profile information.

- **Cookie Settings.** If you wish to prevent cookies from tracking your activity on our Sites or visits across multiple websites, you can set your browser to block certain cookies or notify you when a cookie is set; you can also delete cookies. The "Help" portion of the toolbar on most browsers will tell you how to prevent your device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to delete cookies. Visitors to our Sites who disable cookies will be able to browse the Sites, but some features may not function.
- **Industry Ad Choice Programs.** You can also control how participating third-party ad companies use the information that they collect about your visits to our websites and use of our mobile applications, and those of third parties, in order to display more relevant targeted advertising to you. If you are in the U.S., you can obtain more information and opt out of receiving targeted ads from participating third-party ad networks at [aboutads.info/choices](http://aboutads.info/choices) (Digital Advertising Alliance). You may also download the DAA AppChoices tool (<https://youradchoices.com/appchoices>) in order to help control interest-based advertising on apps on your mobile device.
- **Marketing Communications.** You can opt out of receiving marketing emails from us by using the unsubscribe feature in any such email we send you.
- **Account and Profile Information.** You may access, update, or correct your account and profile information at any time by logging in to your account and updating the Personal Information we maintain. We may keep a copy of your prior information for a period of time, as part of our business records and our backup data.

## Children's Information

Our Services are not designed for children, and we do not knowingly collect Personal Information from children under the age of thirteen (13). If we learn that we have received information directly from a child who is under the age of 13, we will delete such information from our systems. If you are a parent or legal guardian and you believe we have collected your child's information in violation of applicable law, please contact us using the contact information below.

## **External Links**

When you use our Services, you may find links to other websites that we do not own or control. We are not responsible for the privacy practices of these other sites, including their collection of your Personal Information. You should review the terms and conditions and privacy policies of these other sites before providing your information.

## **Blogs and Other Features**

We may offer blogs, online forums or other interactive features in connection with our Services that enable you to share information about the Services or other issues of interest. You should be aware that any communications you submit or post to any such interactive features on the Services may be viewable by other participants or users. By submitting or posting to such interactive features you acknowledge and agree that you have no expectation of privacy or confidentiality in the content you submit for such features, whether or not it contains Personal Information about you.

## **Artificial Intelligence**

We or our third party service providers may use artificial intelligence (AI) to provide products or services to you, which may involve the use of your Personal Information from the Sources described herein. We may use AI in connection with our products or services to facilitate and service our business (e.g., assist in underwriting, pricing, claims handling process or data management), as well as to enhance performance and user experience on our websites and applications. The type of AI we use varies based on your relationship with us and by product and service.

## **Security**

We have implemented safeguards designed to protect Personal Information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

## **Changes to This Policy**

This Policy is current as of the Effective Date set forth above. We may change this Policy at any time and from time to time. Any amendments or modifications to this Policy will become effective immediately upon posting. We will let you know of amendments or modifications by appropriate means such as by posting the revised statement on this page with a new "Last Updated" date. Your continued use of any of our Services following the posting of a revised version of this Policy will constitute your acceptance of the revised Policy. If you do not agree with the revised Policy, do not use any of our Services.



## Contact Us

If you have questions about this Policy or our privacy practices or our use of AI, please contact us using the contact information provided below.

### Chubb Group

Attention: NA Privacy Office

202 Hall's Mill Road, P.O. Box 1600

Whitehouse Station, NJ 08889-1600

Telephone: 1-833-324-9798

E-mail: [NAPrivacyOffice@chubb.com](mailto:NAPrivacyOffice@chubb.com)

## Consent

By using the Services or by consenting using a consent mechanism where provided you signify your consent to this Policy and this site's Terms and Conditions. If you do not agree to this Policy or the site's Terms and Conditions, please do not use the Services. The Services are not for use within any country or jurisdiction or by any persons where such use would constitute a violation of law. If this applies to you, you are not authorized to access or use any of the Services.

## Additional Notice to California Residents

*If you would like to exercise your rights under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"), please visit us at our [Data Subject Request web page](#) or call us at the following toll-free telephone number 1-833-324-9798.*

*You can find Healthy Paw's [CCPA Notice at Collection](#) below.*

This section of our Privacy Policy provides additional information for California residents pursuant to the CCPA and applies to "Personal Information" as defined in the CCPA, whether collected online or offline. This section of our Privacy Policy applies to [www.healthypawspetinsurance.com](http://www.healthypawspetinsurance.com) and other websites or mobile applications that link to this Privacy Policy (the "Services"), as well as offline activities where California residents are directed to this section of the Privacy Policy. As used in this section of our Privacy Policy, "Personal Information" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

### Service Provider

Healthy Paws may sometimes act as a service provider under the CCPA. This means that we collect and use Personal Information on behalf of another company. Where your Personal Information is processed by Healthy Paws acting as a service provider, that other company's privacy policy will explain its privacy practices, and you should submit any request to exercise CCPA rights directly to that company. If you

make a request to exercise CCPA rights to Healthy Paws it acts as a service provider under the CCPA, we may be required to disclose your request to the relevant company.

### **Personal Information Not Covered by this California Section of the Privacy Policy**

There are a number of exemptions from the application of the CCPA. The following sets out some of the categories of Personal Information that are not subject to the CCPA, and therefore are not covered by this California section of the Privacy Policy. Note that other sections of the Privacy Policy may still apply in addition to other privacy notices that we may issue addressing our specific relationship with you, including privacy notices that are sent to individuals.

- Health or medical information that we collect and that is subject to the Health Insurance Portability and Accountability Act of 1996 ("**HIPAA**"), the California Confidentiality of Medical Information Act or the Health Information Technology for Economic and Clinical Health Act.
- Information we collect in connection with the issuance of financial products or services to you that are to be used primarily for your personal, family, or household purposes and that is subject to the Gramm-Leach-Bliley Act ("**GLBA**") or the California Financial Information Privacy Act. For example, where we provide you with a personal insurance policy, or where we handle a claim from you as an individual. Note that this exclusion may not apply to all of your Personal Information, including to personal information collected before you become a customer. Healthy Paws provides a separate GLBA privacy notice to certain individual consumers as required under applicable laws and regulations.
- Information we collect and provide for use that is subject to the Fair Credit Reporting Act.
- Information we collect as a motor vehicle record and that is subject to the Driver's Privacy Protection Act of 1994.
- Publicly available information from government records, and information we have a reasonable basis to believe is lawfully made available to the general public by you or by widely distributed media, or by a person to whom you have disclosed the information and not restricted it to a specific audience.
- Deidentified or aggregated information.

### ***California Notice At Collection***

#### **Categories of Personal Information Collected & Disclosed**

The following identifies the categories of Personal Information we may collect about you (and may have collected in the prior 12 months). Note that our collection, use and disclosure of Personal Information about you will vary depending upon the circumstances and nature of our interactions or relationship with you. Depending on how you use our Services, we may collect the following categories of Personal Information:

- **Identifiers**, such as real name, alias, address, email address, date of birth, policy number, salary information, social security number, driver's license number, other government identifiers, and tax ID.

- **Online Identifiers**, such as unique personal identifiers, device IDs, ad IDs, IP addresses, and cookie data.
- **Customer or Claimant Records**, such as paper or electronic customer or claimant records containing Personal Information, as well as information provided by an insurance broker/agent or reinsurer for underwriting purposes and information included in a list of claims, such as name, signature, address, telephone number, social security number, passport number, driver's license or state identification card number, insurance policy number, bank account number, payment card number, and records of personal property, products or services purchased or obtained.
- **Financial Information**, such as your bank account or credit card number and other payment details.
- **Usage Data**, such as Internet or other electronic network activity information regarding a California resident's interaction with portals, Internet websites, applications, or advertisements, including, but not limited to, browsing history, clickstream data, search history and content of public posts.
- **Geolocation Data**, such as physical location or movements.
- **Audio, Video and Other Electronic Data**, such as audio information including call recordings, video and photographs.
- **Inferences and Preferences**, such as inferences drawn from any of the information described in this section about a consumer including inferences reflecting the consumer's preferences, characteristics, behavior and abilities.
- **Sensitive Personal Information**, such as social security number, driver's license number, racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, medical condition, and physical or mental disability.

### **Sources of Personal Information**

We generally collect Personal Information from the following categories of sources:

- Directly from you and automatically;
- Our affiliates;
- Brokers and agents;
- Veterinary providers; and
- Our vendors and service providers (e.g., third party administrators).

### **Purposes for Collecting and Disclosing Personal Information**

As described in the "**How We Use Personal Information**" section above, in general, we collect and otherwise process the personal information we collect for the following business or commercial purposes:

- Operate our business;
- Provide you products and services;
- Communicate with you;

- Evaluate and improve our products and services;
- Analytics models to support our business;
- Marketing and advertising;
- Inferences;
- Find locations on request;
- Fraud and security purposes;
- Legal requirements;
- Business transfers; and
- Other operational and business purposes.

### **Sensitive Personal Information**

Notwithstanding the purposes described above, we do not collect, use, or disclose "sensitive personal information" beyond the purposes authorized by the CCPA. Accordingly, we only use and disclose sensitive personal information as reasonably necessary and proportionate: (i) to perform our services requested by you; (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents; (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct; (iv) to verify or maintain the quality and safety of our services; (v) for compliance with our legal obligations; (vi) to our service providers who perform services on our behalf; and (vii) for purposes other than inferring characteristics about you.

### **Retention of Personal Information**

We retain the Personal Information we collect only as reasonably necessary for the purposes described in this Privacy Policy or otherwise disclosed to you at the time of collection. For example, we will retain certain identifiers for as long as it is necessary to comply with our tax, accounting and recordkeeping obligations, to administer certain policies and coverage, and for research, development and safety purposes, as well as an additional period of time as necessary to protect, defend or establish our rights, defend against potential claims, and to comply with our legal obligations. From time to time, we may also deidentify your Personal Information, retain it and use it for a business purpose in compliance with CCPA.

### **Disclosure of Personal Information to Third Parties and Other Recipients**

The categories of Personal Information we may have disclosed for a business purpose in the preceding twelve (12) months include: identifiers, online identifiers, customer records, financial information, usage data, geolocation data, audio, video, and other electronic data, inferences, and sensitive personal information.

The categories of third parties and other recipients to whom we may disclose personal information for a business purpose may include:

- Affiliates and business partners;
- Vendors and service providers;

- Acquirers of business assets;
- Advisors, auditors, consultants, and representatives;
- Agents and brokers;
- Reinsurers;
- Regulators, government entities, and law enforcement;
- Operating systems and platforms; and
- Others as required by law.

Additionally, the CCPA defines "sale" as disclosing or making available personal information to a third-party in exchange for monetary or other valuable consideration, and "sharing" includes disclosing or making available personal information to a third-party for purposes of cross-contextual behavioral advertising. While we do not "sell" Personal Information, we may "share" the following categories of Personal Information: online identifiers, and usage data. We disclose this information to third-party advertising networks, analytics providers, and social networks for purposes of marketing and advertising. We do not sell or share "sensitive personal information," nor do we sell or share any Personal Information about individuals who we know are under sixteen (16) years old.

### **Rights Regarding Your Personal Information**

The CCPA provides California residents with specific rights regarding Personal Information. This section describes your rights under the CCPA and explains how to exercise those rights. Subject to certain exceptions, California consumers have the right to make the following requests:

***Right to Know.*** With respect to the Personal Information we have collected about you in the prior (twelve) 12 months, you have the right to request from us (up to twice per year and subject to certain exemptions and carveouts):

- The categories of Personal Information we collected about you;
- The sources from which we have collected that Personal Information;
- Our business or commercial purpose for collecting, selling, or sharing that Personal Information;
- The categories of third parties to whom we have disclosed that Personal Information; and
- A copy of the specific pieces of your Personal Information we have collected.

***Right to Correct.*** Subject to certain restrictions, you have the right to request that we correct inaccuracies in your Personal Information.

***Right to Delete.*** Subject to certain conditions and exceptions, you have the right to request deletion of your Personal Information that we have collected about you.

***Right to Opt-Out.*** You have the right to opt-out of "sales" and "sharing" of your Personal Information, as those terms are defined under the CCPA. While we do not "sell" Personal Information, our use of certain third-party analytics and advertising cookies may constitute "sharing" under the CCPA. To exercise your right to opt-out of the "sharing" of your Personal Information, please use the *Do Not Sell or Share My Personal Information* link at the bottom of our Site.

You also have the right to opt-out of "sales" and "sharing" of your Personal Information through the use of an opt-out preference signal. If our Site detects that your browser or device is transmitting an opt-out preference signal, such as the "global privacy control" - or GPC - signal, we will opt that browser or device out of cookies on our Site that result in a "sale" or "sharing" of your Personal Information. If you come to our Site from a different device or from a different browser on the same device, you will need to opt-out, or use an opt-out preference signal, for that browser and/or device as well.

***Right to Limit Use and Disclosure of Sensitive Personal Information.*** We do not engage in uses or disclosures of Personal Information that would trigger the *right to limit use of sensitive personal information* under the CCPA.

***Right to Non-Discrimination.*** We will not discriminate against you for exercising any of the rights described in this section.

### **Exercising Your Rights**

If you are a California resident and would like to exercise your CCPA rights, you may do so via any of the methods described below:

- Accessing our [Data Subject Request](#) web page; or
- Calling us at 1-833-324-9798

***Authorized Agent.*** You may designate someone as an authorized agent to submit requests and act on your behalf. Authorized agents will be required to provide proof of their authorization in their first communication with us, and we may also require that you directly verify your identity and the authority of your authorized agent.

Businesses operating as an authorized agent on behalf of a California resident must provide both of the following:

- (1) Certificate of good standing with its state of organization; and
- (2) A written authorization document, signed by the California resident, containing the California resident's name, address, telephone number, and valid email address, and expressly authorizing the business to act on behalf of the California resident.

Individuals operating as an authorized agent on behalf of a California resident must provide a written authorization document, signed by the California resident, containing the California resident's name, address, telephone number, and valid email address, and expressly authorizing the individual to act on behalf of the California resident.

We reserve the right to reject (1) authorized agents who have not fulfilled the above requirements, or (2) automated CCPA requests where we have reason to believe the security of the requestor's personal information may be at risk.

***Verification.*** Before responding to your request, we must first verify your identity using the Personal Information you recently provided to us. The information we need in order to verify your identity differs depending on the request made and our relationship with you, and might include (as applicable) your name, the email address you regularly use to interact with us, your phone number, your date of birth, and, if available, your policy number. We will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional

information to verify your identity, or where necessary to process your request. In some cases, we may also carry out checks, including with third party identity verification services, to verify your identity before taking any action with your Personal Information. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

### **Artificial Intelligence**

We or our third party service providers may use artificial intelligence (AI) to provide products or services to you, which may involve the use of your Personal Information from the Sources described herein. We may use AI in connection with our products or services to facilitate and service our business (e.g., assist in underwriting, pricing, claims handling process or data management), as well as to enhance performance and user experience on our websites and applications. The type of AI we use varies based on your relationship with us and by product and service.

### **Contact Us**

If you have any questions about this section of the Privacy Policy, our privacy practices, or our use of AI, or if you wish to exercise your rights under California law, please contact us at:

#### **Chubb Group**

Attention: NA Privacy Office

202 Hall's Mill Road, P.O. Box 1600

Whitehouse Station, NJ 08889-1600

Telephone: 1-833-324-9798

E-mail: [NAPrivacyOffice@chubb.com](mailto:NAPrivacyOffice@chubb.com)