



California Independent Contractor Privacy Notice

Effective Date: January 1, 2023

This Notice describes how LifeShield National Insurance Co., and Individual Assurance Company, Life, Health & Accident, (collectively “LifeShield”, “we”, “us”, or “our”) collects, uses and discloses personal information relating to you for a variety of Agent/Agency-related purposes both before, during and after your appointment to LifeShield. Although the disclosures in this Privacy Notice may often reflect LifeShield’s policies and practices with respect to all Independent Contractors (Appointed Agents), this Privacy Notice is specifically applicable to Independent Contractors (Appointed Agents) who are California residents, consistent with applicable state laws.

This California Independent Contractor Privacy Notice may be updated from time to time. This Privacy Notice is also posted on LifeShield’s website and Agent Portal.

This Notice covers our practices only in the context of your relationship with LifeShield as an independent contractor (appointed agent). This policy does not apply with respect to the personal information we collect about California residents who are appointed agents as that data is subject to the Gramm-Leach-Bliley Act (“GLBA”).

This Notice does not constitute or form part of any contract (for example, your appointment contract).

I. How We Collect Information

- Directly from you, during the appointment process (e.g., the application form that you complete), from specific third-party sources (e.g., references by Up Lines and background checks), as well as throughout your tenure with LifeShield;
- Directly from you, when you input the information into our Agent Portal or otherwise provide it to a representative of LifeShield;
- Automatically, when you use a device issued by LifeShield, or use a technology system operated by LifeShield (e.g., our EApp tool).

II. Information We Collect

To carry out our activities and obligations as a Contracting Entity, we may collect, store, and process the following categories of information, but not limited to:

- *Personal Details*, including home address and phone number, personal email address, date of birth, nationality, citizenship, race, gender, marital status, government identifiers (e.g., Social Security number, passport or driver’s license number), photographs, and bank account details;

- *Professional Qualifications*, including appointment application materials, background check results, certifications and licenses held;
- *Compensation Information*, which may include bank account information, Social Security number, and contact information such as home address, email address and phone number;
- *Physical and Electronic Access Records*, including credentials we assign to permit you access LifeShield's Agent Portal;
- *Device Information and Usage Details* when you utilize LifeShield's technology, such as EApp, Quoting Tools or the Agent Portal. Such information may include login credentials, model, serial number, device location, usage data, and operating information; details about your interaction with our technology assets, (such as the date, time, and length of use sessions);
- *Electronic Communications* that you send via any LifeShield-issued account or via any other documents or data you may provide;
- *Any Other Information* you voluntarily provide to us.

III. How We Use Your Information

We will use your information, for the following business purposes:

- To facilitate commencement of your appointment to become a representative of LifeShield and sell LifeShield products;
- To fulfill our appointment contract (if any) and to pay commissions, as well as facilitate conducting performance reviews;
- To manage our company appointments, including assessing agent satisfaction, conduct required training (if applicable), evaluating efforts to maintain and retain appointed agents, and investigate customer or other complaints;
- For business planning, insurance and regulatory compliance purposes, including accounting, tax and finance, operational management and budget forecasting, and
- To maintain the safety, and security of our appointed agents, and to safeguard Company assets, interests, and legal rights.

IV. How We May Disclose Your Information

We may disclose your personal information to service providers rendering services on LifeShield's behalf. Common examples of service providers are service providers who require certain independent contractor information in order to provide services to LifeShield, such as IT services, maintenance and hosting of our website and Agent Portal, accounting, auditing, and other professional services.

We may also disclose your information to providers who offer retirement, health, and other benefit programs, services, or products to which you and your dependents or beneficiaries receive access through your employment.

We may share your personal information where necessary to comply with applicable law, to respond to requests from regulatory authorities (including tax authorities), government agencies, and parties (including LifeShield’s legal or other advisors) in legal proceedings or to enforce our rights under our terms of service and policies.

We do not sell Personal Information of California residents who are Consumers or Independent Contractors.

V. Monitoring Business and Private use of Company Systems

LifeShield may, in accordance with local law, carry out monitoring operations on its information systems, technology assets, and communications systems (collectively, “our Systems”).

LifeShield reserves the right to preserve, collect, search, review, and disclose data or documents created or stored through our Systems or on our premises. The contents of communications and usage information may be disclosed to third parties (including LifeShield’s affiliates, law enforcement, regulatory authorities, courts and counterparties in litigation and our or their agents anywhere in the world) where reasonably required by LifeShield and in accordance with applicable data protection law.

VI. Security

We use physical, technical and administrative measures designed to protect personal information. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure, and LifeShield makes no representation or commitment regarding the security of your personal information, except as otherwise required by law.

If you have reason to believe that your personal information is no longer secure (for example, if you feel that your Agent Portal password has been compromised), please immediately notify the LifeShield Agent Services Department.

VII. Retention of Your Information

We will retain your personal information for as long as is necessary to complete the purposes for which it was collected, or as may be required by law.

California law requires us to provide information regarding the criteria we use to determine the length of time for which we retain personal information. We utilize the following criteria to determine the length of time for which we retain workforce information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or is otherwise necessary to investigate theft or other activities potentially in violation of Company policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information such as those listed above may exist in different systems that are used for different business or legal purposes. For example, Agent Writing Numbers are linked to an Agent profile that is retained for the length of time for which an individual is an independent contractor. But it is also used on commission records, which are disposed after a set period of time. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

VIII. Updates to Your Information

You can update review and update certain aspects of your personal information through the Agent Portal. We encourage you to promptly update your personal information if you discover it is inaccurate, or if it changes, for instance, if you move. If you are unable to correct any information, please contact LifeShield Agent Services immediately for assistance.

IX. Additional Information

California residents have the right to receive notice of the categories of personal information we collect, the purposes for which those categories of personal information will be used, and how we determine the length of time for which the personal information is maintained. You are also entitled to receive notice regarding your rights under California law. To the extent that we collect personal information relating to you in your capacity as an independent contractor that is subject to the California Consumer Privacy Act (“CCPA”), that information and our practices are described below.

Our Practices

The categories we use below to describe personal information are those enumerated in the CCPA. Certain personal information may fall into multiple categories. These examples of personal information listed below are illustrative and do not represent a complete description of the data elements we process. For additional information, see Sections II - III above.

Sale, Sharing, and Disclosure of Personal Information for a Business Purpose

The law also requires us to list the categories of third parties to whom we “sell” or “share” personal information

We do not sell personal information relating to our customers or independent contractors. Personal information may be disclosed to service providers, which are companies that we engage to conduct activities on our behalf, as described in Section IV above. Service providers are restricted from using personal information for any purpose that is not related to our engagement.

Your Rights

You have the right to request **access** to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You have the right to request we **correct inaccurate information**. In certain circumstances, you have the right to request that we **delete personal information** that we have collected directly from you, or to **limit the processing** of sensitive personal information. We do not process sensitive personal information in a way that gives rise to the right to limit processing. California residents additionally have the right to opt out of the sale or sharing of their personal information, however, LifeShield does not sell or share personal

information relating to our workforce members.

You have the right to be free from discrimination or retaliation based on your exercise of your CCPA rights.

How to Submit a Request

You may submit a request to exercise your rights to know/access, correct, or delete your Personal Information through one of two means:

- By sending an email to lifeshieldnationalinsuranceco@lifeshieldnational.com or
- By calling us at 800-851-5041.

You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make any of the requests described above on your behalf.

- When submitting your request, please provide the following information:
 - Who is submitting the request – You or your Authorized Agent
 - Is this request associated with (include all that apply):
 - Business
 - Consumer
 - Independent Contractor
 - Are you a customer or former customer of LifeShield Y or N
 - Provide your request type:
 - I want to access personal information collected or shared
 - I want to request my personal information be deleted
 - I want to request a correction to my personal information on file
 - Your full name
 - Your email address
 - Your Street Address, including city, state, and zip code
 - Your phone number
 - How do you want us to respond to your request
 - Email or
 - Postal Mail

Upon submission of your request, we will contact you via mail or email as you choose in your request to the address provided in your request. The information you submit in your request will be matched against our records to authenticate you and you will be contacted if further authentication is required.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

X. Changes

We reserve the right to amend this Notice from time to time and encourage you to periodically review it. All changes to the Notice are effective as of the Effective Date noted at the beginning.

XI. Questions about Our Use of Your Information

Please direct questions and requests related to this Privacy Notice or your personal information to the Director of Compliance at the email address or 800 number listed above.