



California Privacy Policy

This California Privacy Policy is for California residents only. This policy describes the personal information that LifeShield National Insurance Co. and Individual Assurance Company, Life, Health & Accident, (collectively “LifeShield,” “we,” “us,” or “our”), collect, use, disclose and protect personal information and data we receive through our business activities, website, mobile applications, and other online services and communication channels, including via email, telephone, or our Administrative Offices (collectively, the “Services”). “You” and “your” refer to any California user or visitor who accesses or uses the Services.

The specific personal information that we collect, use and disclose relating to a California resident covered by the California Consumer Privacy Act of 2018, as amended from time to time (CCPA) will vary based on our relationship with you. For example, this policy does not apply with respect to personal information we collect about California residents who apply for or obtain our insurance coverage or visit our website, as the personal information we collect is subject to the Gramm-Leach-Bliley Act (“GLBA”), and/or the Health Insurance Portability and Accountability Act (“HIPAA”). For more information about how we collect, disclose and secure information relating to these customers, please see our Privacy Notice.

We may change this California Privacy Policy from time to time. When we do, we will post the revised policy on this page with a new “effective date” date at the bottom of this California Privacy Policy. Any changes to this California Privacy Policy will become effective when posted unless indicated otherwise.

1. INFORMATION WE COLLECT

We obtain information about you from multiple sources such as, you, your employer or benefits plan sponsor (if applicable), other insurers, third-party administrators, and health care providers. This information is known as Protected Health Information (“PHI”) and includes personal information which identifies you that is not public such as your health, medical conditions, prescriptions and payment for health care products and services. This type of information includes:

- Demographic Identifiers such as: Name, physical or mailing address, email address, phone number, Social Security Number, and Driver’s License Number.
- Personal Information such as: Name, physical or mailing address, email address, phone number, Social Security Number, Driver’s License Number, date of birth, credit and debit card numbers or bank account information.
- Detailed Health Information such as medical history, or medical records.
- Test Results (laboratory or radiology tests)
- Other Insurance Information such as policy numbers or member IDs for other policies.

- Internet Activity such as: Device ID, browsing history, Geolocation, device location and IP Address.
- Audio/Visual information such as voice recordings.
- Protected Class Information such as race, ethnicity, national origin, gender, age, marital status, veteran or military status.

2. PURPOSE OF COLLECTION AND USE.

In order to provide life and health insurance benefits, we may use and share PHI about you as we believe to be necessary or appropriate for certain essential purposes, including:

- To comply with and enforce applicable legal and regulatory requirements, relevant insurance industry standards, or contractual obligations, such as reinsurance or administrative purposes;
- To detect, prevent, or investigate fraud, suspicious or other illegal activities;
- For analytical purposes such as performance measurement and outcomes assessments;
- To protect our rights and privacy operations, and/or that of our affiliates, business partners, you or others;
- For underwriting and rating purposes;

Note that we may aggregate data we collect on an anonymous basis that does not identify you for any purpose otherwise allowed by applicable law, such as for research, analysis, modeling, marketing, and advertising, as well as improvement of our Services.

A. Customers, Contacts, and Visitors. In addition to the purposes described immediately above, we may also use personal information of customers, contacts and visitors to:

- Process applications and transactions, and facilitate other customer activities;
- Verify your identity or authenticate your device (such as when you access or submit an online application), and to enhance our online security measures and prevent fraud;
- Provide you with customer support, and quality assurance of the same;
- Operate and improve our business and operations, including internal administration, auditing and troubleshooting for our Services;
- Provide, improve, test, and monitor the effectiveness of the Services, diagnose and fix technology issues.

3. CATEGORIES DISCLOSED FOR BUSINESS PURPOSES

In order to provide life and health insurance benefits, we may use and share the following categories of personal information for the business purposes noted below:

- Demographic identifiers to Service Providers, such as our Third-Party Administrators contracted in connection with completing transactions on our behalf and/or supporting

our everyday operations; Entities/Providers to whom you or your representative have authorized disclosure or other covered entities, or Government Agencies as required by law or regulations.

- Internet Service Providers and contractors in connection with monitoring the performance of our website, improving the user experience and ensuring the security of our Services for verification and authentication to prevent fraud.
- Call Recordings for customer service monitoring and regulatory compliance purposes to prevent fraud and ensure transactions are completed correctly.
- Protected class information provided to Government Agencies in connection with routine and required reporting.

Personal Information may also be disclosed externally when we believe it is necessary or appropriate to: (i) comply with applicable legal requirements, including, but not limited to, regulatory, court, and law enforcement demands (e.g., subpoenas, court orders, etc.); (ii) respond to an emergency or otherwise protect the rights and property of LifeShield and our employees, agents, customers, or others, including to enforce our policies and terms of use; (iii) address fraud, security, or technical issues; and (iv) in connection with, or during negotiation of, any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets (including in connection with any bankruptcy or similar proceedings).

4. COOKIES

We do not use third-party analytics tools for California, however, we may capture the IP address of the device you use to connect to our website, the type of operating system and browser you use to help assist us in improving your online experience. We may use third-party cookies, web beacons or other similar technologies to collect or store other information about your visit to, or use of, our Services. We do not share any information collected with third parties that provide these tools or allow them to use any information for their own purposes.

Rejecting Cookies. Most internet browsers allow you to block cookies. If you block cookies, your browsing experience may be affected, and you may not be able to use all of the features of our Services. You can delete cookies that are already stored on your computer or device by following the instructions associated with your browser and operating system.

We do not utilize any ad partners, so there is no need to opt out of interest-based advertising. However, should you still wish to utilize the opt out feature, a cookie will be placed on your browser indicating your choice. Because cookies are stored by your browser, any opt-out election you make is valid only for the computer/device and browser combination used to opt out. If you opt out of interest-based advertising, again please note that we do not utilize ad partners, and you should not receive any advertisements from us. Clearing your browser's cookies will remove your opt out because it is stored in a cookie, and you will need to opt out again.

5. USE OF SENSITIVE PERSONAL INFORMATION

We do not use or disclose sensitive personal information for purposes other than those which are necessary to perform the services or provide the products reasonably expected and do not collect or process sensitive personal information for the purpose of inferring characteristics about a consumer.

6. RETENTION

We retain your personal information for the period required by law or regulation and for a period thereafter to comply with our legal obligations and otherwise support our fraud prevention activities. The time period that any category of personal information may be retained is governed by the record/system it is contained in and our legal and regulatory obligations as to that record/system rather than the category of personal information.

7. NOTICE OF FINANCIAL INCENTIVE

We do not provide a financial incentive or a price or service difference to customers in exchange for the retention or sale of their personal information. We do not send promotions or offers to customers or other individuals, and therefore, while an opt out is unnecessary, a customer may still choose to opt out, and the customer should not receive such notices irrespective of whether any information privacy request described here has been submitted. We do not offer financial incentives to deter customers from making such requests.

8. SECURITY

We use technical, physical, and administrative security measures designed to comply with applicable law and protect the security of your personal information, including information you submit to us through the Site. This includes but may not be limited to device safeguards, encryption, and firewalls.

Please note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels (like email) to communicate sensitive or confidential information (such as your social security number) to us.

9. CCPA Rights. If you are a California resident, you have the right to:

- Right to Know. You have the right to request access to, and a copy of, the categories of personal information we have collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the categories of third parties and service providers to whom we disclose it. Please remember that the data we collect is not subject to the CCPA as California Civil Code §1798.145(e) provides an express exemption for Data that is subject to the GLBA or HIPAA Privacy Laws.
- Right to Correct. You also have the right to correct inaccurate personal information, taking into account the nature of the personal information and the

purposes of the processing of the personal information.

- Right to Limit or Delete. Additionally, you have the right to request in certain circumstances that we limit the use of your sensitive personal information or delete personal information that we have collected directly from you.
- Right to Opt-out of Sale or Sharing of Personal Information. We do not sell or share personal information for monetary gain.
- Submitting a Request. You may submit a request to exercise your rights by sending an email to lifeshieldnationalinsuranceco@lifeshieldnational.com, or by **calling us at 800-851-5041**. You may authorize another individual or a business, called an authorized agent, to make requests on your behalf through these means.
 - 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. Thus, we ask you to provide personal identifiers we can match against information we may have collected from you previously, and to confirm your request using the email address or telephone number stated in the request.

- Right to Non-Discrimination. You have the right to be free from discrimination based on your exercise of your CCPA rights.

10. CONTACT US

Please contact us about this California Privacy Policy or our Services at 800-851-5041 or via email at lifeshieldnationalinsuranceco@lifeshieldnational.com.

11. EFFECTIVE DATE

This California Privacy Policy was last revised and is effective as of 1/1/2023.