COPPERPOINT INSURANCE COMPANIES

PRIVACY NOTICE

This notice is provided by the CopperPoint family of companies that includes CopperPoint Insurance Company, Alaska National Insurance Company, Pacific Compensation Insurance Company and their affiliated companies ("We"/"Us"/"Our").

This notice is intended to comply with the federal Gramm-Leach-Bliley Act ("GLBA") and its applicable implementing regulations as well as various state laws and regulations applicable to the privacy of information collected and/or used in connection with an insurance transaction and is relevant to all insurance products/services provided by the CopperPoint family of companies. Separate notices are intended to comply with various state laws and regulations applicable to the privacy of information not subject to the GLBA, including the California Consumer Privacy Act ("CCPA"). You may review these notices on Our website at https://www.copperpoint.com/legal/privacy-policy or through any of the other options listed at the end of this notice.

We value your privacy and strive to comply with various laws and regulations protecting nonpublic personal information that We collect about you ("Personal Information"), which is more fully described below in Part 1, entitled Categories of Personal Information We Collect, Use and Disclose. Depending in part upon where you reside and/or the nature of your business with Us, these federal and state legal protections will include the GLBA, the CCPA and the California Insurance Information and Privacy Protection Act (IIPPA). This notice is to inform you of Our privacy policies and practices applicable to your Personal Information. You're not required to reply to this notice; it is provided for your review to better understand your rights and what We do with your information.

General Policy Statement:

We will not collect, use, retain or disclose your Personal Information in a manner that is unlawful or contrary to this notice, or discriminate against you for exercising any of your privacy rights.

We utilize your Personal Information to provide the benefits, services and products you expect from Us. In so doing, We endeavor to protect the confidentiality and security of your information. This includes protecting it against unauthorized use or access through various, industry standard security features and limiting authorized access to persons and organizations based upon business need. We do not sell your Personal Information, including your financial information, or disclose your Personal Information to nonaffiliated third parties unless reasonably necessary to administer Our insurance services, perform a related function, as permitted or required by law, or as otherwise described in this notice. If you're Our customer, We reserve the right to disclose your nonpublic Personal Information, including your financial information, to Our affiliates for marketing purposes, which We may do without obtaining your prior authorization since the law does not allow customers to restrict these limited disclosures.

We will not prepare or request an investigative consumer report about you in connection with an application for insurance, a policy renewal, a policy reinstatement or a change in insurance benefits without separately notifying you. We will not use illegal or unethical means to collect information about you, including the use of pretext interviews. For example, We will not refuse to identify, or misrepresent ourselves or the true purpose of an interview to acquire your information. But this prohibition is not intended to hinder legitimate fraud investigation techniques. We will not solicit information from you solely for marketing or research purposes without clearly specifying that such questions are designed for these purposes. We will not intentionally collect information about you if you are a minor outside of information required or necessitated by an insurance transaction or as otherwise authorized by law.

Your rights regarding information We collect about you depends upon the type of information We collect, the purpose for which We collect it and your status as a consumer, customer, business prospect or other status type, as well as the jurisdiction in which you reside. This notice and Our policies and practices are not intended to create or bestow rights greater than or in addition to any rights you're entitled to under laws applicable in your resident jurisdiction.

Laws, technologies and business demands change over time and, therefore, this notice is subject to change with them. The version date of this notice is printed on the bottom of each page for your ease of reference. This notice may also be supplemented by various, additional privacy policies that are sent separately or appear elsewhere, for example, Our CCPA policy that appears on Our website or at other points where We collect your information, either electronically or in person.

Part 1: Categories of Personal Information We Collect, Use and Disclose

We collect, use, retain and disclose Personal Information, which includes nonpublic information that identifies, describes or reasonably relates to a particular individual, including you, as outlined in the chart below. Personal Information doesn't include information that is (i) publicly available from government sources or (ii) deidentified or aggregated. The types of individuals We collect Personal Information on include Our policyholders, beneficiaries under Our policies, those who apply to Us for insurance coverage, those who might register to receive information from Us, visitors to Our website, those who make inquiry to Us and others.

Certain information may be deemed legally privileged information, meaning We do not have to disclose it because it relates to a claim for insurance benefits or a civil or criminal proceeding involving an individual and is collected in connection with or in reasonable anticipation of such a claim or proceeding.

We have collected and/or shared – but not sold – the following categories of your Personal Information within the past 12 months from the sources identified below for the business and commercial purposes listed:

Categories and Examples of Personal Information	Collect	Sell	Share
(I) Personal identifiers: A real name, alias, signature, social security number, physical characteristics or description, address, email address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	Yes	No	Yes
(II) Personal characteristics of protected classifications under state or federal law: Race, color, age (40 years and older), ancestry, national origin, citizenship or immigration status, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes	No	Yes
(III) Commercial information: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	No	Yes
(IV) Biometric information: Physiological, biological or behavioral characteristics, including an individual's deoxyribonucleic acid (DNA), imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise.	No	No	No
(V) Internet or other electronic network activity information: Browsing history, search history, IP address and information regarding a consumer's interaction with an internet website, application, or advertisement. (This category does not include information that is actively entered into an online form.)	Yes	No	Yes

Categories and Examples of Personal Information	Collect	Sell	Share
(VI) Geolocation data: Physical location and/or movements.	Yes	No	Yes
(VII) Sensory data: Audio, electronic, visual, thermal, olfactory, or similar information.	Yes	No	Yes
(VIII) Professional or employment-related information: Current and/or past employment history including performance evaluations.	Yes	No	Yes
(IX) Non-public education information (as defined in the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)): Education records, files, documents, and other materials directly related to a student maintained by an educational agency or institution or by a person acting for such an agency or institution, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes	No	Yes
(X) Inferences drawn from other Personal Information: Information used to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No	No	No

PART 2: How We Collect Your Personal Information and Our Sources of Information

The Personal Information We collect about you may come from the following types of sources using the following types of techniques, some of which may overlap, including:

A. Person(s), including you, when reporting claims or related information, applying for insurance benefits and completing an insurance application for coverage, or from agents/brokers acting on your behalf, from payroll processors and from public records. For example, We may record and retain the information that you send Us through traditional, electronic or telephonic communications, including completing online forms, sending emails or leaving voicemail recordings.
B. Consumer reporting agencies.
C. Beneficiaries under Our insurance policies, including you, from interviews, claim forms, workers' compensation applications and notices, medical records, tax records, public records, employers, investigators, surveillance audio/video and other third-party sources.
D. Witnesses from interviews and investigations.
E. Your treating physician or other healthcare providers upon request or pursuant to subpoena.
F. Vendors and business partners from interviews, premium audits, contracts, public records and consumer reports.
G. Employment records and personnel files upon request or pursuant to subpoena.
H. Visitors, including you, to Our live events from sign-in sheets or electronic attendance/registration rosters or visits to and interactions with Our websites either directly or through cookies or a link provided in an electronic communication using web counters or other technologies. Please note that third-party websites or applications that you choose to access through links provided on Our websites should be scrutinized before interacting with them since they may also collect information about you, which is subject to their collection practices and outside of Our control.
I. Other insurance institutions and insurance support organizations upon request or pursuant to subpoena.

PART 3: Uses of Personal Information

We do not sell your Personal Information and We will not collect it or use it contrary to this notice without further notice to you. We may use the categories of Personal Information referenced above for various purposes related to Our business operations, including:

1) To fulfill or meet the reason you provided the information, including to permit either the disclosing or receiving insurance institution, agent or insurance-support organization to perform its function in connection with an insurance transaction. For example, if you share your name and contact information to request a price quote or ask questions about Our services, We will use that Personal Information to respond to your inquiry. If you provide your Personal Information to purchase a product or service, We will use that information to process your payment and facilitate delivery.
2) To facilitate the customer service experience, including personalized support and responding to your service inquiries, and to improve the quality of Our operations, including information verification. To provide you with information about Our services that you may request from Us or that We may be required to provide you.
3) To create, maintain, customize and secure your account with Us, and to help maintain the safety security, and integrity of Our website, products and services, databases and other technology assets, and business.
4) To guide Our decision-making process when tailoring Our service offerings or marketing efforts.
5) To determine eligibility for insurance benefits, process your claims, requests, purchases, transactions, payments, and to prevent transaction fraud.
6) To personalize your experience with Us and to deliver content and service offerings relevant to your interests, including targeted offers and promotions through Our website and other electronic and telephonic communications.
7) For service reviews, audits, testing, research, analysis, and product development, including to develop and improve Our website, products and services, and for the purpose of conducting actuarial or research studies.
8) To respond to law enforcement requests and as required by applicable laws, court order, or local, state or federal government regulations. For example, abandoned or unclaimed property (escheatment) laws and state insurance department information requests.
9) As necessary or appropriate to protect the rights, property, or safety of you, Us, Our clients, or others.
10) As described to you when collecting your Personal Information or as otherwise set forth in the applicable privacy laws of the jurisdictions within which We operate and you reside.
11) To evaluate or conduct financing, a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Us about you is among the assets transferred.
12) To verify your identity, process your registration, claim or application for any of Our services, including verifying your information is accurate and valid.
13) To interact with insurance industry support organizations. For example, the Insurance Services Office, Inc. (ISO), that prepares reports pertaining to insurance transactions that may be retained by such organizations and disclosed to other persons without authorization and as a fraud identification tool.
14) For internal business purposes.
15) To defend or prosecute claims, including conducting investigations relating to insurance transactions.
16) To contact you with regard to your use of any of Our services and, in Our discretion, changes to any of Our services and/or any of Our services' policies.
17) To obtain a background check, consumer report, or investigative consumer report about you, including a motor vehicle record (MVR).
18) For any legitimate purpose that you have expressly authorized Us to use it for.

PART 4: Who We Share Information With

When We share your Personal Information, We do so with the following categories of affiliates and nonaffiliated third parties:

a) Service providers and contractors.
b) Data aggregators and analytics providers.
c) Government agencies, including law enforcement.
d) Medical or healthcare service providers, including professional peer review organizations.
e) Other insurance institutions and insurance industry support organizations, including reinsurers.
f) Our affiliates.

g) A suitor pursuant to a potential business transfer.
h) Advertising or social media networks (to direct content to you only on Our behalf, not theirs, as We do not sell your Personal Information to them for their own use).
i) Any third-party upon your or your agent's written authorization or as required by law.

PART 5: Your Privacy Rights

In addition to the rights discussed above – and upon proper identification and verification – you have the right to request and obtain access to, and disclosure of your Personal Information on record with Us. You also have the right to correct, amend or delete your Personal Information subject to various limitations and retention requirements, including information that is deemed legally privileged, relates to your own insurance claim or a civil or criminal proceeding, or is required to be maintained for legal, regulatory or business purposes.

To make such a request, you must do so in writing to **gccompliance@copperpoint.com** and reasonably describe the information you wish to access and whether you seek a correction, amendment, or deletion. We will respond with our determination within 30 business days from receipt of your written request. If We disagree with your request, We will advise you of your right to challenge Our determination and if We refuse your request, you will have the right to file a statement regarding what you believe to be accurate and fair information and why you disagree with Our refusal.

We reserve the right to charge a reasonable fee to cover the costs incurred in providing you with a copy of any information you request from Us using this process. If you are Our policyholder or a beneficiary under Our policy, you may have your request processed sooner and avoid any such fees by contacting Us using the information listed below.

Please be advised that these rights do not extend to information about you that relates to and is collected in connection with or in reasonable anticipation of a claim or a civil or criminal proceeding involving you.

Further Information:

Please visit Our website at **www.copperpoint.com/legal/privacy-policy** or contact Us for further information about Our privacy policies and practices and your rights under the GLBA, CCPA and/or other privacy laws, including information on how this notice can be accessed in an alternative, ADA accessible format.

If you're a policyholder, please contact your insurance agent or broker to verify, make changes to, or request information about your policy or coverages, or you may contact Us using the contact information below.

If you're a claimant/beneficiary under one of Our policies, please contact the claims examiner assigned to your claim or Our claims department to verify, make changes to, or request information about your claim(s), or you may contact Us using the contact information below.

Toll-free Phone: **1-800-231-1363**
(Our office hours are 8 a.m. to 5 p.m., Monday through Friday, excluding holidays.)
Website: **www.copperpoint.com/contact-us**
Email: **gccompliance@copperpoint.com**

This notice is subject to change and may be supplemented by various, additional privacy policies that are sent separately or appear elsewhere, including on Our website or delivered in person or by mail.