This privacy policy ("Privacy Policy") describes how All Spectrum Insurance Brokers and its subsidiaries (collectively, "All Spectrum", "we", "us", or "our") collects and uses the personal information related to:

- The use our websites and associated services that link to this Privacy Policy, including <u>www.asibrokers.com</u> and other websites controlled by All Spectrum (the "Sites");
- Our former, current and prospective clients;
- Individuals who communicate with us; and
- Individuals who use our products and services ("Services") and individuals whose personal information we receive in providing the Services.

This Privacy Policy also describes the choices available to you regarding our use of your personal information and how you can access and update this information. This Privacy Policy is part of, and hereby incorporated into, the Sites' Terms of Use. We recommend that you review the Terms of Use governing your use of this Site and its content by clicking <u>here</u>.

Our Sites

The Sites are controlled by All Spectrum Insurance Brokers, unless a Site identifies (in its terms of use or otherwise) that it is controlled by another All Spectrum entity. All Spectrum, as well as individual divisions of All Spectrum, may have their own websites with their own privacy policies, in which case this Privacy Policy will not apply to such websites unless such website provides a link to this Privacy Policy.

Information We Collect

When using our Sites, you may voluntarily provide information about yourself. We collect this information when you contact us through our Sites, create an account, provide us with personal information required to fulfill Services, or interact with us for any other purpose.

We may collect the following personal information about you through our Sites:

- Contact information such as name, email address, mailing address, and phone number;
- Billing information such as payment card number and billing address;
- Unique identifiers such as user name, account number, and password;
- Preference information such as marketing preferences and interests in relation to our Services;
- Information associated with your inquires to us, including information you may voluntarily submit to us by completing forms on our Sites; and

Information associated with your use of our Sites and Services.

We may also collect additional personal information (subject to applicable legal requirements and restrictions) in providing our Services, operating our business, and interacting with individuals in the course of our business, which may include:

- Demographic information such as race, gender, marital status, date and place of birth, employer, job title and employment history;
- Identification numbers issued by government bodies or agencies (e.g. your social security or national insurance number, passport number, ID number, tax identification number, or driver's license number);
- Information necessary to secure insurance products, provide risk consulting services, and/or offer guidance on other Services to you, which may include (where necessary) health data, criminal records data and other special categories of personal information required to provide such Services;
- Information about the insurance quotes individuals receive and the policies they obtain;
- Information about current and/or previous claims, which may include health data, criminal records data and other special categories of personal information related to such claims;
- · Income and other financial information; and
- Records of real property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.

All Spectrum may also collect non-personally identifiable information when you visit or use our Sites or in the course of providing Services.

All personally identifiable information collected on our Sites is considered personal information and will be treated in accordance with this Privacy Policy. By using our Sites and submitting your personal information, you agree with and consent to the processing, transfer, usage, and storage of your personal information in accordance with this Privacy Policy.

Cookies

We collect information relating to your interactions with us and our Sites, including browser configuration, the type of operating system you are using, and information about your Internet service provider and other information we collect through the use of cookies and similar technology.

All Spectrum may use cookies to improve your online browsing experience. These cookies will not store data like your name, physical address, e-mail address, or telephone number. They merely inform us that you have previously visited our site.

"Cookies" are small pieces of information that are stored by your browser on your computer's hard drive. Most Web browsers automatically accept cookies, but you can usually change your browser settings to prevent it from doing so.

How We Use Your Information

We may use your information for any lawful purpose, including the following:

- To create, maintain and service your account;
- To respond to your inquires;
- To provide Services you request, including to provide publications to which you subscribe;
- To operate, personalize, and improve the Sites, including for analytics purposes;
- To send promotions and marketing materials that may be of interest to you;
- For our other business purposes, such as research, payment processing, and operational purposes;
- To comply with applicable law(s) and to maintain the security of our Sites; or
- With your consent, or as otherwise disclosed at the time information is collected.

Information Sharing

All Spectrum may share your personal information with other parties in the ways that are described in this Privacy Policy, including the following:

- With our affiliate vendors, consultants, agents, contractors, and other service providers that we use to support our business;
- To operate, maintain, and improve our Sites;
- To provide Services you request;
- With third party vendors who process data on our behalf such as payment processors, customer service providers, and email service providers;
- As part of a corporate sale, merger, or acquisition, or other transfer of all or part of our assets, including as part of a bankruptcy proceeding;
- Pursuant to a subpoena, court order, governmental inquiry, or other legal process or as otherwise required by law, or to protect our rights or the rights of third parties;
- With your consent or as otherwise disclosed at the time of data collection or sharing.

We may share information that has been anonymized or aggregated without limitation.

Third-Party Links and Tools

Our Sites may provide links to third-party websites or applications. We do not control the privacy practices of those websites or applications, and they are not covered by this

Privacy Policy. You should review the privacy notices of other websites or applications that you use to learn about their data practices.

Our Sites may also include integrated social media tools or "plug-ins," such as social networking tools offered by third parties. If you use these tools to share personal information or you otherwise interact with these features on the Sites, those companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public. Your interactions with third-party companies and your use of their features are governed by the privacy notices of the companies that provide those features. We encourage you to carefully read the privacy notices of any accounts you create and use.

California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit the <u>CCPA Privacy Notice</u>.

Nevada Privacy Rights

Although we do not currently conduct sales of personal information, Nevada residents may submit a request directing us to not sell personal information we maintain about them if our practices change in the future.

To exercise this right, please contact us:

- By phone at (408) 739-8300
- Email at <u>info@asibrokers.com</u>

Minors

All Spectrum is committed to protecting the privacy needs of children and encourages parents and guardians to take an active role in their children's online activities and interests. We do not knowingly collect information from children under the age of sixteen (16), and All Spectrum does not target its Sites to children.

Your Choices

If you decide that you do not wish to receive marketing emails from All Spectrum, you may opt-out of receiving further e-mails by clicking "Unsubscribe" in such emails. You may also opt out or unsubscribe from future emails by sending a request to info@asibrokers.com using the subject line "Unsubscribe from email communications." To ensure your opt-out request is properly processed, be sure to send your message using the same email account to which we sent our correspondence.

Updating Your Information

You may change any of your personal information in your account by editing your profile within your account or by sending an e-mail to us at <u>info@asibrokers.com</u>. Each request will be reviewed and responded to in accordance with applicable laws.

Changes to Our Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our Sites prior to the change becoming effective. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. If our information practices change, we will post these changes on this page.

Contact

If you have questions, comments, or concerns about this Privacy Policy, please contact us:

- By phone at (408) 739-8300
- Email at <u>info@asibrokers.com</u>