



California Consumer Privacy Act Disclosure

ADDITIONAL NOTICE TO CALIFORNIA RESIDENTS

The state of California enacted the California Consumer Privacy Act of 2018 (“CCPA”), which was amended by ballot measure in 2020 (the California Privacy Rights Act 2020 (the “CPRA”) and effective January 1, 2023, to further Californians’ right to privacy by giving CA residents an effective way to know of and control their Personal Information collected by companies doing business in CA.

Please note that many organizations following the law will refer to the updated law as the CPRA after January 1, 2023. However, the California Privacy Protection Agency (the “Agency”), which is the regulatory body charged with enforcing the CCPA and CPRA, has indicated it will continue to call the law the CCPA. Where we use “CCPA” in the requirements we are following the Agency’s approach and are referring to the law as updated by the CPRA.

North American Risk Services, Inc. (“NARS,” “we,” or “us”), as a third-party insurance claims administrator, is committed to keeping your Personal Information secure and provides this Disclosure to explain how we collect, use, and disclose Personal Information relating to California residents. NARS recognizes that privacy is an important and protected right. This Disclosure pertains to the collection, use, security, and sharing of Personal Information in California. It applies to all products, services and websites offered by NARS and its subsidiaries or affiliated companies. This Disclosure does not apply to any third-party websites, applications or portals linked to NARS’ sites. Those websites and services are governed by the privacy policies that appear on those sites and applications. We will not collect or use Personal Information for purposes other than those described in our Privacy Policy or this Disclosure, or in any supplementary privacy notices.

Service Provider

NARS acts as service provider under the CCPA. This means that we collect and use Personal Information on behalf of another company, such as an insurance company or managing general agency, to provide claims management services to third party insurers and insureds. Where your Personal Information is processed by NARS acting as a service provider, this Disclosure will explain our privacy practices, and you should submit any request to exercise CCPA rights directly to us. Please note that in some instances, if you make a request to exercise CCPA rights to NARS where it acts as a service provider under the CCPA, we may be required to disclose your request to the relevant company.

What is Personal Information

The CCPA generally defines “Personal Information” as 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 and can include:

- (A) Identifiers such as a real name, alias, postal address, unique personal Identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.

(B) Any Personal Information described in subdivision (e) of Section 1798.80, including but not limited to name, signature, physical characteristics or description, address, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information,

(C) Characteristics of protected classifications under California or federal law.

(D) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

(E) Biometric information.

(F) Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement.

(G) Geolocation data.

(H) Audio, electronic, visual, thermal, olfactory, or similar Information.

(I) Professional or employment-related Information.

(J) Education information, defined as information that is not publicly available personally Identifiable information as defined In the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).

(K) Inferences drawn from any of the Information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

(L) Sensitive personal information.

"Sensitive Personal Information" means: (1) Personal Information that reveals (A) a consumer's social security, driver's license, state identification card, or passport number; (B) a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (C) a consumer's precise geolocation; (D) a consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; (E) the contents of a consumer's mail, email and text messages, unless the business is the intended recipient of the communication; (F) a consumer's genetic data; and (2)(A) the processing of biometric information for the purpose of uniquely identifying a consumer; (B) Personal Information collected and analyzed concerning a consumer's health; or (C) Personal Information collected and analyzed concerning a consumer's sex life or sexual orientation.

The CCPA, however, does not apply to publicly available information lawfully made available from federal, state, or local government records, or information subject to other federal laws such as the Gramm-Leach-Bliley Act regarding information collected when a CA consumer requests and/or obtains insurance financial products and services; or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or by the consumer; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience.



Personal Information Not Covered by the CCPA and this Disclosure

There are a number of exemptions from the application of the CCPA. The following are categories of Personal Information that are not subject to the CCPA, and therefore are not covered by this Disclosure Notice. The obligations imposed by the CCPA do not apply to:

- Health or medical information that is collected 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 collected 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 an insurer provides you with a personal insurance policy or handles a claim from you as an individual.
- Information collected that is subject to the Fair Credit Reporting Act.
- Information collected 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.
- Compliance with federal, state, or local laws, law enforcement, a court order or subpoena, a civil, criminal, or regulatory inquiry, investigation, or summons as provided by law.

CALIFORNIA NOTICE AT COLLECTION

Rights Regarding Your Personal Information. The CCPA provides a California consumer with specific rights regarding Personal Information, subject to certain exceptions and requirements. A California consumer can make the following requests:

Right to Know What Personal Information is Being Collected. You have the right to request (up to twice per year and subject to certain exemptions and carveouts):

- The categories of Personal Information we collected about you;
- The categories of sources from which Personal Information is collected;
- The business purpose for collecting or disclosing, that Personal Information;
- The categories of third parties with whom we disclose that Personal Information; and
- The specific Personal Information we have collected.

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

we are not required to delete Personal Information where a CCPA exception exists. For example, we do not have to delete Personal Information that is needed to provide our services, detect security incidents and protect against illegal activity, or engage in statistical research in the public interest.

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

Right to Know What Personal Information is “sold” or “shared,” or disclosed for a business purpose, and to whom. Note, however, that we do not “sell” or “share” Personal Information as defined by the CCPA. You also have a right to see by category the Personal Information we have disclosed and the categories of persons to whom your Personal Information was disclosed for a business purpose.

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. However, we do not “sell” or “share” Personal Information.

Right to Limit Use and Disclosure of Sensitive Personal Information. The CCPA says a consumer shall have the right, at any time, to direct a business that collects sensitive Personal Information about the consumer to limit its use of the consumer's Sensitive Personal Information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services. However, 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 No Retaliation. You have the right to be free from discrimination because you exercise any of the rights under the CCPA. We will not discriminate against you for exercising any of the rights described in this section.

Categories and Use of Personal Information Collected

The specific Personal Information we collect, use, and disclose will depend on our specific relationship or interaction with that individual. We collect and disclose Personal Information in a variety of situations, including, Personal Information on individuals who may be pursuing an insurance claim for benefits or damages, or applying for or maintaining employment, or persons who provide vendor services.

The following identifies the categories and types of Personal Information we may collect about you (and may have collected in the prior 12 months), and may have disclosed:

- 1) **Identifiers**, such as name, alias, job title, date of birth, policy number, salary information, address, Social Security number, e-mail address, drivers’ license number or similar identifier;
- 2) **Personal information**, as defined in California law, such as education, employment history, financial and health information, contact information, social security number, address, telephone number, driver’s license number, insurance policy number, customer or claimant records containing Personal Information, as well as information provided by an insurance company, broker/agent or reinsurer for underwriting purposes and information included in a list of claims;
- 3) **Characteristics of Protected Classifications** under California or federal law, such as age, medical condition, sex and marital status;

- 4) **Commercial Information**, such as transaction and account information, and records of personal property, or services provided;
- 5) **Biometric Information** such as individual biological or behavioral characteristics;
- 6) **Usage Data** such as internet or other electronic network activity information;
- 7) **Geolocation data** such as physical location or movements.
- 8) **Audio, electronic, visual**, or similar information, such as phone call recordings;
- 9) **Professional or Employment-Related Information**, such as employment history, qualifications, licensing, and disciplinary record.
- 10) **Inferences** drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.
- 11) **Sensitive Personal Information**, such as social security number, driver's license number, medical condition, and physical or mental disability.

The purposes for which we collect and use Personal Information depends on our relationship or interaction with a specific CA resident but is generally used to provide claims services to enable us to operate our business. We may use Personal information to communicate with you, process, investigate, manage and adjust claims, provide our products and services, employment, vendor management, and to accomplish our business purposes, including, research and data analysis, detection and prevention of fraud, subrogation, salvage and deductible collections, loss control, processing of workers' compensation claims, compliance with legal obligations, litigation management, risk management, auditing, responding to state departments of insurance and other legal functions, our systems and infrastructure. We may also use Personal Information for analytics models to support our business and to evaluate and improve our services.

We do not collect, use, or disclose Sensitive Personal Information beyond the purposes authorized by the CCPA, and only use and disclose it 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.

Sources of Personal Information

The categories of sources of Personal Information NARS collects includes from you, insurance companies, brokers and agents, customers, employers, publicly accessible sources, vendors, medical and health vendors, contractors, and website visitors and processes such information in accordance with our Privacy Policy and applicable laws.

Disclosure of Personal Information to Third Parties and Other Recipients

The categories of Personal Information we have disclosed for a business purpose in the preceding twelve (12) months include Identifiers, Personal Information, Characteristics of Protected Classifications, Commercial Information, Audio, Electronic, Visual, or similar information, Professional or Employment-Related Information, and Sensitive Personal Information.



The categories of third parties and other recipients to whom we may disclose Personal Information for business purposes consistent with the CCPA include:

- 1) Affiliates, subsidiaries, and business partners;
- 2) Vendors and service providers;
- 3) Advisors, auditors, consultants, and representatives;
- 4) Insurance company clients;
- 5) Independent Claims Adjusters;
- 6) Claim Investigative Providers;
- 7) Engineering Services or other consultants.
- 8) Attorneys and Tax advisors
- 9) Agents and brokers;
- 10) Reinsurers;
- 11) Regulators, government entities, and law enforcement;
- 12) IT systems and platforms;
- 13) Others as required by law.

NARS discloses Personal Information with other companies or individuals in the following limited circumstances:

- 1) We have express authorization, or;
- 2) NARS restricts access of Personal Information to NARS employees, vendors, medical and health vendors, healthcare providers who provide independent medical examinations, insurance carriers, legal counsel, your employer, medical equipment companies, claims adjusters, companies that structure settlements/annuities and determine lifespans and state and other government agencies, the Centers for Medicare and Medicaid Services, contractors and agents who need to know such information in order to operate, develop or improve services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination, if they fail to meet these obligations. We have a good faith belief that use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of NARS, its users or the public as required or permitted by law.
- 3) We may disclose aggregated, non-personal information, which does not identify an individual user.

PLEASE NOTE THAT WE DO NOT SELL A CONSUMER'S PERSONAL INFORMATION TO A THIRD PARTY FOR MONETARY OR OTHER VALUABLE CONSIDERATION.



IN ADDITION, WE DO NOT SHARE BY MEANS OF RENTING, DISCLOSING, DISSEMINATING, TRANSFERRING OR MAKING AVAILABLE A CONSUMER'S PERSONAL INFORMATION TO A THIRD PARTY FOR CROSS-CONTEXT BEHAVIORAL ADVERTISING, WHETHER OR NOT FOR MONETARY OR OTHER VALUABLE CONSIDERATION.

How to Make Requests

If you are a California resident, you may make a request to exercise the rights above by contacting us at:

- (800) 315-6090;
- privacy@narisk.com; or
- Completing our [Data Subject Request](#)

Or write to us at:

North American Risk Services, Inc.

Attention: Privacy Inquiries

P.O. Box 166002

Altamonte Springs, FL 32716-6002

Note that under the CCPA, we are not obligated to provide the information required in this Disclosure to you more than twice in a 12-month period.

Please note however, as a service provider or contractor we shall not be required to comply with a verifiable consumer request received directly from a consumer or a consumer's authorized agent to the extent that we have collected Personal Information about you in our role as a service provider or contractor. Instead, a service provider or contractor shall provide assistance to a business with which it has a contractual relationship with respect to the business's response to a verifiable consumer request.

Verification Of Consumer Requests

Under the CCPA, the request can be made by a California consumer, by a consumer on behalf of the consumer's minor child, or by a natural person or a person registered with the Secretary of State, authorized by the consumer to act on the consumer's behalf, or by a person who has a power of attorney or is acting as a conservator for the consumer, and that we can verify, using commercially reasonable methods, to be the consumer about whom we have collected Personal Information. We have no obligations to act if we cannot verify that the consumer making the request is the consumer about whom we have collected Personal Information or is a person authorized by the consumer to act on such consumer's behalf.

In order to respond to your request, we will first verify your identity using the Personal Information you recently provided to us. The information we need in order to verify your identity may differ depending on the request made and our relationship with you and might include your name, mailing address or email address you use to interact with us, your phone number, your date of birth, your policy number, or other information. We will attempt to verify your request by matching the information provided by you with the information we have in our records. 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. For privacy reasons, we reserve the right to request additional information to verify your



identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and will explain the reason for the denial.

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.

A business operating as an authorized agent 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 must provide a written authorization document, signed by the California resident, containing the California resident's name, address, telephone number, and valid email address, with express authorization of 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.

We shall use any Personal Information collected from you or your agent in connection with our verification of your request solely for the purposes of verification, and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

Retention of Personal Information

We retain the Personal Information we collect only as reasonably necessary for the purposes described in this Disclosure Notice. We will retain certain Personal Information for as long as it is necessary to comply with our tax, accounting and recordkeeping obligations, for fraud investigative purposes, for purposes of any relevant statute of limitations, to administer certain policies and coverage, and for research and development 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.

Contact Us

If you have any questions or comments about this section of the Privacy Policy, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

North American Risk Services, Inc.
Attention: Privacy Inquiries
P.O. Box 166002
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Last Updated: 2024