



North American Risk Services, Inc.

Privacy Policy

North American Risk Services, Inc. (“NARS,” “we,” “our,” and “us”) recognizes that privacy is an important and protected right. This Privacy Policy (“Policy”) pertains to the collection, use, disclosure and security of your information, including Personal Information (as defined below) when you visit our website, download our mobile applications (if applicable), or receive our claims services. It applies to all products, services and websites provided by NARS and its subsidiaries or affiliated companies.

As a third-party claims administrator, we may act as a processor of personal data (as defined by state law) on behalf of another company, such as an insurance company or managing general agency, to provide claims management services to third party insurers, insureds, and claimants. This means we collect and use Personal Information on their behalf and must adhere to their instructions and assist with data security and consumer requests. If we are acting as a processor/service provider under state law, any request you make to exercise your privacy rights to NARS will be disclosed to the relevant insurance company for response.

There are many individual state laws governing the collection and use of Personal Information. Generally, (1) we attempt to limit the collection of Personal Information to what is adequate, relevant and reasonably necessary in relation to the purposes for which such information is processed; (2) except as otherwise provided in state law, we do not process Personal Information for purposes that are neither reasonably necessary to, nor compatible with, the purposes for which such Personal Information is processed; and (3) we establish, implement and maintain reasonable administrative, technical and physical data security practices to protect the confidentiality, integrity and accessibility of Personal Information appropriate to the volume and nature of the personal data at issue.

This Policy does not apply to any third-party websites, services, 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 this Policy and/or in any supplementary privacy notices. If you are a California resident, please see the California Consumer Privacy Act Disclosure for more information.

Information We Collect

NARS may collect information about you or your household that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or a household member (“Personal Information”) as part of the claims process. As described below, we collect Personal Information directly from you, automatically through your use of our website, and from third-party sources. As permitted by applicable law, we may combine the information we collect from publicly available or third-party sources.

We may collect Personal Information directly from you, indirectly through the course of providing our services, and from third parties that interact with us in connection with the services we provide. This includes information from insurance companies, agents, brokers, customers, employers, publicly accessible sources, vendors, service providers, contractors, medical and health vendors/providers, consumer reporting agencies, law enforcement, courts, government agencies, other companies or individuals, and website visitors. NARS processes such information in accordance with our Policy and applicable laws.

Personal Information does not include publicly available information, such as information lawfully made available from government records, 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, or deidentified or aggregated information.

Personal Information we collect may include the following categories:

- Information we receive about or from you or your insurance company on applications and other forms, including your name, alias, gender, marital status, address, email address, phone number, insurance policy number, date of birth, social security number, family member information, property location,
- Property value, insurance policy and claim information, including materials we receive as part of the claim.
- Recordings of phone calls as well as email messages and contents and other communications when interacting with our customer service or claims representatives.
- Information we receive from consumer reporting agencies, other insurers, medical providers, and insurance support organizations, such as motor vehicle records, claims loss history, employment history, professional licenses and affiliations, date and cause of injury, disability, death, and credit report information.
- Identification numbers issued by government agencies, including passport number, tax identification number, military identification number, national resident number, driver's or other license number, social security number, or other government-issued identifiers.
- In certain cases, and only as permitted by law, information about your current or former physical or mental or medical condition, health status, injury or disability information, medical procedures performed, personal habits, prescription information and medical history from medical and health providers.
- Information from financial institutions as permitted by law, including bank account number and account details, credit history and credit score.
- Information about your transactions and experiences with us, our affiliates, your insurance company, or others, such as your policy coverage, premiums, payments, and claims history.
- Analytics data developed directly or through third-party analytics tools and services.
- Our computer servers will record information sent by the user's browser whenever our website is visited, including information like the web request, geolocation information, domain name, browsing history, Internet Protocol address, browser type and location, unique device ID, device type, browser language, date/time, and cookies that may uniquely identify the user's browser. Data is maintained in encrypted form on secure servers.
- Sensitive Personal Information. Some states have specific rights and responsibilities regarding sensitive Personal Information, which may include personal data such as (1) data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation or citizenship or immigration status, (2) genetic or biometric data that may be processed for the purpose of uniquely identifying an individual, (3) personal data collected from a known child, (4) precise geolocation data, (5) status as transgender or nonbinary, or status as a crime victim, or (6) information about an individual's specific past or present location. Some states also include information like your social security number, driver's license, state identification card, passport number, information which reveals a consumer's status as a victim of a crime, financial information (such as a tax return), and consumer health data. Please see the California Privacy Policy on this web site for its specific definition.

- NARS may send cookies, a small file containing a string of characters, to the user's computer. Like many companies, we may use cookies to improve your web site experience. Most browsers are initially set up to accept cookies, but users may reset the browser to refuse all cookies or to indicate when a cookie is being sent. However, some NARS features may not function properly if cookies are disabled. In such instances, NARS may be unable to provide requested services.
- Some services are offered in connection with other web sites. Other company sites may place their own cookies on a user's computer, collect data or solicit Personal Information. Information provided to those sites may be sent to us. NARS does not exercise control over sites displayed as hyperlinks from or to the NARS site. Affiliated sites may have different privacy practices and we encourage you to review them.

Use of Personal Information

We may use the Personal Information that we collect for the following purposes. We process this information to perform our contractual obligations to you, for our legitimate business purposes, to comply with legal obligations and to exercise any legal rights we may have:

- To run our day-to-day claims business operations processing, adjusting and administering claims under an insurance policy, including subrogation and salvage operations, to communicate with you and others about managing your claim, to evaluate and process your claim, to conduct customer surveys, and to manage disputes and legal actions;
- To evaluate and improve claims processes, procedures, quality, security, and training, including analytics models that might apply to claims services and loss control;
- To better understand how you access and use our sites and the products and services available (both on an aggregated and individualized basis) to better communicate with you;
- To investigate, enforce, and apply this Policy and our Terms of Use, and to otherwise protect our own rights and interests;
- To detect, prevent, or otherwise address suspected fraud, potential threats to the safety of any person, violations of this Policy or our Terms of Use, or as evidence in litigation, security, or technical issues;
- To manage our business operations, to consider and implement mergers, acquisitions, reorganizations, refinancing, and other business transactions, and for the administration of our general business, accounting, recordkeeping, and other legal functions;
- To comply with internal policies and procedures, quality assurance, auditing, accounting and billing, IT systems, data and website hosting, and to resolve complaints;
- To pay insurance claims, pay third-party service providers and other payees, and to make other business-related payments;
- To cooperate with applicable federal, state and local agencies, regulators, courts, laws, and law enforcement including laws regarding money laundering, and government requests for information, including the Centers for Medicare and Medicaid Services; and
- To recruit and evaluate candidates in the employment process.

We also may use automated processes and aggregate any of the Personal Information we collect for any of these purposes or for analyzing statistics and trends.

Our services are not designed for children, and we do not knowingly collect Personal Information from children under the age of thirteen (13). If we learn that we have received information directly from a child who is under

the age of 13, we will delete such information from our systems. If you are a parent or legal guardian and you believe we have collected your child's information in violation of applicable law, please contact us.

How We Protect Customer Information

We maintain strict physical, electronic, cyber and procedural security measures that comply with applicable federal and state laws to protect your Personal Information. We also restrict access to your Personal Information to only those individuals who need to know that information to operate, develop, provide or improve products or services to you. All employees, agents, affiliates, and third parties are required to adhere to our privacy standards and use Personal Information only for legitimate business purposes.

How We May Disclose Personal Information

NARS does not disclose any information about our customers or former customers to anyone except as permitted by law, authorized by you, or as described above in Use of Your Personal Information. NARS does not sell your Personal Information. We also do not share personal data for cross-context behavioral advertising or use your personal data for targeted advertising (as those terms are defined by applicable state law). NARS may disclose any of the above categories of Personal Information with the following categories of third parties:

- Affiliated companies, subsidiary companies, insurance agents, brokers, claims representatives, customer service representatives, and IT representatives, as well as the insurance company clients and their auditors, lawyers, tax professionals, claims professionals, reinsurers, actuaries, and related professional entities.
- External vendors and third-party service providers, independent claims adjusters, repair shops, claims related vendors, appraisers, mediators, contractors, roofing companies, accountants, medical professionals, experts, actuaries, auditors, lawyers and other outside professional advisors, consumer reporting agencies, financial institutions, credit bureaus and industry reporting agencies, and other companies or individuals associated with our business operations.
- Legal entities or as required by law, including law enforcement, public agencies, regulators, courts, public authorities in compliance with the law, subpoena, judicial proceedings, federal national security reporting, court order, or other legal process.
- Fraud detection and prevention vendors and authorities to investigate, detect, and prevent potentially fraudulent or suspicious activities, including disclosure to state/federal and local investigators, state agencies, law enforcement, attorneys, other insurance companies and their investigators, companies engaged for the detection and prevention of spam and malware mitigation, and other related purposes.

We provide your Personal Information generally in the following circumstances:

- As authorized by law.
- We have your express authorization.
- 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) satisfy our obligations of providing insurance claims services or other customer/marketing services.

- We may disclose aggregated, or de-identified personal information, which does not identify an individual user.
- NARS will not share or sell your Personal information with other nonaffiliated companies for their marketing purposes without your consent.

We may host online forums or other interactive programs that enable you to share information about our services or other issues of interest. Please be aware that any communications with any such program is open for review by other public users. By submitting to any such program, you acknowledge and agree that you have no expectation of privacy or confidentiality in the content you submit, including any Personal Information.

We do not sell Personal Information for monetary or other consideration, and we do not share your Personal Information for targeted advertising or cross-context behavioral advertising, so there is no optional right to opt out of this type of processing.

We contractually require any person or organization providing products or services to consumers on our behalf to protect the confidentiality of all consumer information.

Rights Regarding Your Personal Information

Many states provide specific rights regarding Personal Information, subject to certain exceptions and requirements. Depending on state law, you may make the following requests of us (where we are the controller of your Personal Information, as opposed to a processor/service provider per state law):

- Right to Know, Access and Portability of Personal Information Collected.

You have the right to know if we process your Personal Information and have access to a copy of your Personal Information in a portable, and if feasible, readily usable format that allows you to transmit the data to a third party.

- 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 legal exception exists under state or federal law. For example, we do not have to delete Personal Information that is needed to provide our services; to complete the transaction for which we collected the personal data and take actions reasonably anticipated within the context of our ongoing business relationship with you; to detect errors or bugs in our websites/servers or detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity; engage in statistical research in the public interest; comply with a legal obligation; or make other lawful use of that information as permitted by law.

- 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.

As stated earlier, however, we do not “sell” or “share” Personal Information.

- Right to Opt Out

Subject to specific exceptions, some states may allow you the right to opt out of the processing of your Personal Information for purposes of (A) targeted advertising, (B) the sale of Personal Information, or (C) profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning you. We do not, however, engage in such practices.

- Right to Restrict the Processing of Sensitive Personal Information.

State laws vary in their rules, definitions and exceptions regarding Sensitive Personal Information. However, we do not engage in uses or disclosures of sensitive Personal Information for purposes other than those allowed under state law, and then in compliance with any consent as may be required by state law or excepted under that law.

- Right to No Retaliation or Discrimination.

We will not discriminate or retaliate against any consumer for exercising their rights under the privacy laws, including but not limited to denying or limiting the level or quality of services, or charging different prices.

You have the right to appeal any determination we make as controller by contacting us at the address below. If you disagree with a decision, you must file a concise statement (i) setting forth what you think is the correct, relevant, or fair information and (ii) explaining the reasons why you disagree with the decision regarding the Personal Information. You will be notified in writing of any action taken or not taken in response to the appeal, including a written explanation of the reason for the decisions within the time period allowed by state law.

NARS regularly reviews this Privacy Policy and takes reasonable precautions to protect against unauthorized access, alteration, disclosure or destruction of data and Personal Information. If we receive a formal written complaint, NARS’ will contact the complainant regarding his or her concerns and investigate the issues. NARS will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between NARS and an individual.

This Policy is current as of the Date below. We may change this Policy at any time and from time to time. Any amendments or modifications to this Policy will become effective immediately upon posting. This Policy may change from time to time.

By using the services or by consenting using a consent mechanism where provided you signify your consent to this Policy and this site’s Terms of Use. If you do not agree to this Policy or the site’s Terms of Use, please do not use the services. The services are not for use within any country or jurisdiction or by any persons where such use would constitute a violation of law. If this applies to you, you are not authorized to access or use any of the Services.

We retain the Personal Information we collect only as reasonably necessary for the purposes described in this Privacy Policy. 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 de-identify your Personal Information, retain it and use it for a business purpose in compliance with state laws.

Terms of Service for SMS Communications

- **Consent for SMS Communication**
*Information obtained as part of the SMS consent process will not be shared with third parties.
- **Types of SMS Communications**
- If you have consented to receive text messages from North American Risk Services, Inc., you may receive text messages related to:
 - **Customers and Guests:** Updates regarding your orders, deliveries, or other relevant information.
 - **Job Applicants:** Information about your application status, onboarding materials, or other employment-related updates.

**Standard Messaging Disclosures*

Message and data rates may apply.

You can opt-out at any time by texting "STOP."

For assistance, text "HELP" or visit our [Privacy Policy](#)

Questions and Contact Information

If you have questions about this Policy or our privacy practices, please contact us using the contact information provided below.

- (800) 315-609;
- privacy@narisk.com; or
- **North American Risk Services, Inc.**
Attention: Privacy Inquiries
P.O. Box 166002
Altamonte Springs, FL 32716-6002

Only you, or your authorized agent, may make a request related to your Personal Information. You also may make a request on behalf of your minor child.

We cannot respond to your request or provide you with Personal Information if we cannot (i) verify your identity or authority to make the request, and (ii) confirm the personal information relates to you. To make a verifiable request, you must:

1. provide sufficient information to allow us to reasonably verify you are the person about whom we collected personal information or that you are the person authorized to make the request. If you are an authorized agent, you also will be required to provide proof that you are authorized to make the request, such as by providing a copy of the written permission from the person on whose behalf you are making



the request; and

2. describe your request with sufficient detail that allows us to properly understand, evaluate, and respond.

We will only use Personal Information you provide to verify your identity or authority to make the request. Making a verifiable request does not require you to create an account with us.

Additional Notice to California Residents.

If you want information on California Consumer Privacy Act Disclosure, [click here](#).

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