

Supplemental CCPA Notice for California Consumers

(Effective 1/1/2020)

This Supplemental CCPA Notice supplements the general Privacy Notice information that we provide at or before the point of information collection, and at [Privacy Notice – California](#) for California consumers, as this term is defined in the California Consumer Privacy Act of 2018, as amended (“CCPA”). This Notice is provided on behalf of the Millennial Specialty Insurance, its affiliates, and subsidiaries (collectively “MSI” or “we”, “us” and “our”). This Notice does not apply to employees or job applicants.

What Information Did We Collect?

In the preceding twelve (12) months, we collected the following categories of personal information from California consumers:

Category	Examples
Identifiers	Real name, alias, postal address, online identifier, Internet Protocol address, email address, account name, Social Security Number, driver’s license number, or other similar identifiers.
Personal Information described in California Civil Code § 1798.80(e)	Name(s), signature, physical characteristics or description, telephone number, state identification card number, insurance policy number, education, bank account number, financial information, medical information, or health insurance information.
Protected Classification Characteristics	Age (40 years or older), race, color, national origin, citizenship, 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, or veteran or military status.
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories and tendencies.
Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.

Professional or employment related information	Current or past job history or performance evaluations.
Inferences drawn from other personal information	Profiles reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, and attitudes.
Risk Data	Accident, injury, and/or driving history; this may include data from consumer reporting agencies, such as motor vehicle records and loss history information, health data, or criminal convictions.
Claims Data	Information about previous and current claims, which may include information regarding health, criminal convictions, third party reports, or other personal information.
Transaction Data	Balances, payment histories, parties to transactions, information from consumer reports, and other data collected in relation to our provision of insurance services.

How Did We Collect This Information?

In the preceding twelve (12) months, we obtained personal information about California consumers from the following categories of sources:

- **Information you provide to us directly**, including information provided in your insurance application or other forms and online;
- **Information we collect or receive from third parties**, including brokers you have communicated with in relation to your policy, insurance applications you have completed or that brokers have completed on your behalf, your business dealings with us and other companies including, but not limited to, your claims and payment history, transactions, limits and rates, information required for billing and payments to/from motor vehicle departments, inspection services, medical providers, anti-fraud databases, court judgments and other databases, government agencies, witnesses, experts, loss adjusters, and claim handlers;
- **Social Media:** You may choose to utilize your social media profile from social networking sites, such as Facebook or Twitter, to access content on our website. By doing so, you specifically grant permission and authorize us to collect, store, and use authorized personal information from these sites as indicated during the authorization process;
- **Publicly available sources;** and
- **Our subsidiaries and affiliates.**

How Did We Use This Information?

In the preceding twelve (12) months, we collected personal information from California consumers for the following purposes:

- market, sell and provide insurance to California consumers;
- determine your eligibility for a quote;
- calculate your premium;
- administer your claims, if any;
- answer questions and provide notifications;
- support day-to-day business operations and insurance related functions;
- detect security incidents, protecting against fraudulent or illegal activity, and to comply with regulatory and law enforcement authorities;
- confirm your identity and service your policy;
- conduct claims investigations, medical examinations, inspections, appraisals, roadside assistance, rental car replacement, or repairs;
- provide customer and technical support;
- enhance your customer experience and improve our products and services;
- to provide, support, personalize, and develop our website, products and services;
- create, maintain, customize, and secure accounts;
- conduct analytics and measurements to better identify, understand, and manage risk;
- conduct audits related to a current interaction with a consumer and concurrent transactions;
- undertake internal research for technological development;
- develop and offer new products and services;
- market products and services, including with strategic partners;
- exercising and defending our legal rights and positions;
- managing risk and securing our systems, assets, infrastructure, and premises;
- to evaluate or conduct 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 its Website users is among the assets transferred;
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- to fulfill contractual obligations;
- to help ensure the safety and security of our staff, assets, and resources, which may include, but is not limited to, physical and virtual access controls and access rights management; supervisory controls and other monitoring and reviews, as allowed by law; and emergency and business continuity management;
- as described at or before the point of collecting personal information; and as otherwise required by federal or state law.

With Whom Did We Share Personal Information

In the preceding twelve (12) months, we shared the personal information of California consumers with the following categories of third parties:

- Affiliates;
- Service Providers;
- Public entities and institutions (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, and fraud prevention agencies);
- Professional advisors including law firms, accountants, auditors, and tax advisors; and
- Insurers, re-insurers, policy holders, and claimants.

Categories of Personal Information Disclosed for a Business Purpose

In the preceding twelve (12) months, we have not sold personal information regarding California consumers.

In the preceding twelve (12) months, we disclosed the following categories of personal information regarding California residents for a business purpose:

- Identifiers
- Personal Information
- Protected Classification Characteristics
- Inferences drawn from other personal information
- Internet or other similar network activity
- Professional or employment related information
- Commercial Information
- Risk Data
- Claims Data
- Transaction Data

California Consumer Rights Under the CCPA

The CCPA provides California consumers with specific rights regarding personal information. These rights are subject to certain exceptions, including for example, if the personal information was collected pursuant to Gramm-Leach-Bliley, the privacy law regulating insurance companies. Our response to your exercise of rights may be limited as permitted under law.

Access or Deletion

You may have the right to request that we disclose certain information to you about

our collection and use of your personal information in the twelve (12) months preceding such request, including a copy of the personal information we have collected. You also may have the right to request that we delete personal information that we collected from you, subject to certain exceptions.

Right to Know and Right to Deletion

You can request what personal information we have collected, used, and disclosed in the preceding 12 months. You can also request that we delete your personal information. We may not delete all of your personal information if one of the following exceptions applies:

- **Transactional:** to complete a transaction for which the personal information was collected, provide a good or service requested by you, or perform a contract we have with you;
- **Security:** to detect data security incidents;
- **Error Correction:** to debug or repair any errors;
- **Legal:** to protect against fraud or illegal activity or to comply with applicable law or a legal obligation, or exercise rights under the law, such as the right to free speech; or
- **Internal Use:** to use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information (i.e. to improve our services).

Please note that if we delete your personal information, many of our services will not work the same. For example, we will not be able to provide you with services, your previous opt out requests will not be saved and saved preferences and information will no longer be available.

Specifically, you have the right to request that we disclose the following to you, in each case, in the twelve (12) month period preceding your request:

- the categories of personal information we have collected about you;
- the categories of sources from which the personal information was/is collected
- our business or commercial purpose for collecting personal information;
- the categories of third parties with whom we share personal information;
- the specific pieces of information we have collected about you;
- the categories of personal information about you, if any, that we have disclosed for monetary or other valuable consideration, and the categories of third parties to which we have disclosed the information, by category or categories of personal information for each third party to which we disclosed the personal information; and

- the categories of personal information about you that we disclosed for a business purpose.

You can submit requests by either:

- Calling: 844-788-0873
- Online: ContactUs@msimga.com
- Mail:
MSI
8821 Davis Blvd, Suite 500
Keller, TX 76248

You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative of such person; and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Response Timing

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If more time is needed, we will inform you of the reason and extension period in writing.

Any disclosures that will be provided will only cover the twelve (12) month period preceding our receipt of the verifiable consumer request. If we are unable to fulfill your request, you will be provided with the reason that the request cannot be completed.

We may deliver the personal information to you through your account, if you maintain an account with us, or electronically, or by mail at your option. If electronically, then we will deliver the information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information from one entity to another without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, you will be told the reason this decision was made, and we will provide you with a cost estimate before completing your request.

Rights to opt in and out of information selling

California consumers have the right to direct businesses not to sell your personal information (opt-out rights), and personal information of minors under 16 years of age will not be sold, as is their right, without theirs or their parents' opt-in consent. We do not sell the personal information of consumers.

No account needed

You do not need to create an account to exercise your rights. We will only use personal information provided in a request to review and comply with the request.

No discrimination

You have the right not to be discriminated against for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts, other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; and
- Suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

Will We Update This Privacy Notice?

We reserve the right to make changes to this notice at any time and for any reason. The updated version of this policy will be effective once it is accessible. You are responsible for reviewing this policy to stay informed of any changes or updates.

Who Do I Contact Regarding Privacy?

If you have any questions or comments about this Supplemental CCPA Notice, the general Privacy Notice, or your rights, please do not hesitate to contact us at:

Phone: 844-788-0873

Email: ContactUs@msimga.com

Postal Address:

Millennial Specialty Insurance

8821 Davis Blvd, Suite 500, Keller, TX 76248

Calling: