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# Ullico Inc. Privacy Notice for California Residents

**Effective Date:** January 1, 2020

**Last Reviewed on:** December 30, 2019

This **Privacy Notice for California Residents** supplements the information contained in any other Privacy Notice provided by Ullico Inc. and its subsidiaries and affiliates available at <https://www.ullico.com/legal-privacy> and <https://www.unioncare.com/legal-privacy> and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

## **Information We Collect**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected one or more of the following categories of personal information from consumers within the last twelve (12) months:

Category A - **Identifiers** – 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.

Category B - **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))** – A name, signature, Social Security number, physical characteristics or description, address, telephone 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.

Category C- **Protected classification characteristics under California or federal law** – Age, national origin, citizenship, marital status, medical condition, physical or mental disability, gender.

Category D - **Insurance Information** – Records of prior and/or current insurance coverage and claims activity.

Category E - **Internet or other similar network activity** – Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

Category F - **Geolocation data** – Physical location.

Category G - **Professional or employment-related information** – Job history.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from applications and claim forms you complete.
- Indirectly from you. For example, from observing your actions on our websites.
- From third parties that are authorized to share your information with us, such as insurance support organizations.
- From unions, employers, or other group customers with which you are affiliated.

#### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that information to respond to your inquiry. If you provide your personal information to purchase insurance or financial products, we will use that information to price, underwrite, service and administer those products.
- To provide support, personalize and develop our websites, products, and services.
- To create, maintain, customize, and secure an account you may have with us.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers through our websites, third party sites, and via email (with your consent, where required by law).
- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- 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 our consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

#### **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may share your personal information with the following categories of third parties:

- Vendors and service providers who provide services such as data analysis, payment processing, information technology and related infrastructure, customer service, auditing, marketing and marketing research activities.
- Partners and third parties who provide services such as payment, banking, data storage, legal expertise, tax expertise, and auditors.

### ***Disclosures of Personal Information for a Business Purpose***

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

Category A – Identifiers

Category B – California Customer Records personal information categories

Category C – Protected classification characteristics under California or federal law

Category D – Insurance Information

Category E – Internet or other similar network activity

Category F – Geolocation data

Category G – Professional or employment-related information

We disclose your personal information for a business purpose to the following categories of third parties:

- Vendors and service providers who provide services such as data analysis, payment processing, information technology and related infrastructure, customer service, auditing, marketing and marketing research activities.
- Partners and third parties who provide services such as payment, banking, data storage, legal expertise tax expertise, and auditors.

## **WE DO NOT SELL YOUR PERSONAL INFORMATION TO THIRD PARTIES.**

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### ***Access to Specific Information and Data Portability Rights***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see **Exercising Access, Data Portability, and Deletion Rights**), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- Disclosures for business purpose: identifying the personal information categories that each category of recipient obtained.

We do not provide these access and data portability rights for personal information reflecting a written or verbal business-to-business communication (“B2B personal information”).

#### ***Deletion Request Rights***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see **Exercising Access, Data Portability, and Deletion Rights**), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not provide these deletion rights for B2B personal information.

***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at: 1-800-820-2740
- Emailing us at: [Compliance@ullico.com](mailto:Compliance@ullico.com)
- Writing us at: Ullico Inc.  
8403 Colesville Road  
Silver Spring, MD 20910  
Attn: Privacy Officer

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. 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 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include at least two or more pieces of information to match against personal information about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

***Authorized Agent***

Only you, or a person you have designated in writing as your authorized agent, or who is registered with the California Secretary of State to act on your behalf, or to whom you have provided power of attorney pursuant to California Probate Code Sections 4000 to 4465, ("Authorized Agent"), may make a verifiable consumer request related to your personal information.

If you wish to have an Authorized Agent make a verifiable consumer request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent, and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity 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, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

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

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

#### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the websites and update the notice's effective date. **Your continued use of our websites following the posting of changes constitutes your acceptance of such changes.**

#### **Contact Information**

If you have any questions or comments about this notice, the ways in which Ullico Inc. collects and uses your information described here and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 1-800-820-2740

**Email:** Compliance@ullico.com

**Postal Address:** Ullico Inc.

8403 Colesville Road  
Silver Spring, MD 20910  
Attn: Privacy Officer