

## **ENCOMPASS® ONLINE PRIVACY STATEMENT**

This Online Privacy Statement (“Privacy Statement”) describes the privacy practices of Encompass® and the affiliated companies whose websites and mobile apps link to this Privacy Statement (“Encompass®,” “we,” “our” or “us”). This Privacy Statement explains the information we collect, why we collect it, how we use and share it, and the choices you can make regarding your information.

Encompass®’s insurance customers may also receive a privacy statement for insurance products in the initial policy package and annual policy documents. Those customer privacy statements may contain additional privacy information relating to your customer relationship with us. Those privacy statements and this Online Privacy Statement should be read together.

### **INFORMATION WE COLLECT AND HOW WE COLLECT IT**

Encompass® collects personal and other information about you. Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you. Other, non-personal information does not reveal an individual’s identity such as information that has been de-identified or aggregated. The type and amount of information we collect varies based on what products and services you have with us.

We collect personal information about you in several ways from several sources. We collect personal information directly from you including when you sign up for services, buy a product, subscribe to a membership or mailing list, set up an account with us, activate a feature such as enrolling in our mobile app or during the quoting, registering, application, claims handling or roadside assistance processes. We and service providers working on our behalf collect personal information from you such as IP address, browsing history and other internet activity information when you use one of our websites, mobile apps, view our emails or otherwise engage with us through a computer or mobile device (“Sites”). We also collect personal information about you from third parties such as consumer reporting agencies, state agencies, such as departments of motor vehicles, service providers, marketing companies and data providers, as well as individuals such as your spouse or your parent.

We collect the following categories of personal information:

Categories of Personal Information	Categories of Third Parties
PERSONAL IDENTIFIERS	Name, alias, signature, postal address, phone number, date of birth, unique personal identifier, online identifier, email address, internet protocol (IP) address, state identification card number, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
PERSONAL CHARACTERISTICS	Age, race, ancestry, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity or gender expression), pregnancy, childbirth and related medical status, sexual orientation, veteran or military status, genetic information (including familial genetic information) or other descriptions of your physical characteristics (e.g., height).
COMMERCIAL INFORMATION	Service or product related information including policy coverage information, premiums, account name, policy number, payment history, claims history, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, account log-in, bank account number, credit or debit card number, other payment or financial information, health insurance information, driving record, credit information, medical history, or family member information.
BIOMETRIC AND MULTIMEDIA INFORMATION	Fingerprint, voice print, retinal print, scan of hand or facial geometry, audio, electronic, visual, or similar information.
INTERNET OR OTHER ELECTRONIC NETWORK ACTIVITY INFORMATION	Browsing history, search history, information regarding your interaction with our website, application or advertisement, links you use or web pages you visit while visiting our site or applications, browser type, internet service provider (ISP), cookies, and mobile device information including device identifier or other information.
GEOLOCATION DATA	Physical location, movements, or trip tracking information.
PROFESSIONAL OR EMPLOYMENT INFORMATION	Employment history, union membership, some contents of mail, e-mail and text messages on company devices, applications or communication platforms.
EDUCATION INFORMATION	Education records, grades or transcripts.
INFERENCE	Inferences drawn from any personal information collected to create a profile reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**Sensitive Personal Information:** Some personal information we collect is defined under the law as sensitive personal information. Sensitive personal information we collect includes Social Security number, driver's license number, state identification card number, passport number, customer account log-in, financial account number, debit

card number, credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation information, racial or ethnic origin, religious beliefs, union membership, genetic data, biometric information used for identification, personal health information and sexual orientation or sexual history.

## **USE OF YOUR PERSONAL INFORMATION**

We use your personal for business purposes including to:

- **Provide and maintain your services and products.** We may use your personal information to provide or maintain your service, products, or membership including to set up a product or service or provide a product or service, maintain your account, service your policy, change your policy, handle a claim, complete a transaction, repair a product or respond to customer service requests or other inquiries. We may also collect information about other parties from you to carry out necessary services and/or requests, including adding another driver to an existing policy. If you provide us personal information about others, or if others give us your personal information, we will use the information consistent with the reasons for which it was provided.
- **Improve, develop, and analyze our Sites, services, and products.** We use your personal information and other information to:
  - analyze, improve, develop, or deliver our Sites, products and services and develop new services, products or features using algorithms, analytics software, and other similar methods,
  - conduct actuarial or research studies to maintain, protect and develop our networks, services, and products and protect our customers, and
  - analyze how visitors use our Sites to improve the Sites and enhance and personalize your experience.

We collect some information used for these purposes using analytics software, cookies, and other tracking technologies. For more information about the collection and use of this information, see [Cookies and Other Tracking Technologies](#) below.

- **Communicate with you about your service or product.** We may communicate with you about your product, service, account, policy, or membership, provide you transaction confirmations, payment alerts or other service or product related messages via mail, email, or other available methods such as push notifications.
- **Provide marketing communications.** We may use your personal information to send you communications about products, services, features, and options we believe may interest you. We may send communications via e-mail, regular mail

or may send push notifications via a mobile device. We may also use your information to serve you ads or customized content online.

- **Comply with legal requirements and protect the safety and security of our business.** We may use your personal information to comply with laws, regulations, or other legal obligations, to assist in an investigation, or to enforce terms and conditions. We may use your personal information to protect and defend our rights, network, Sites and other property and the rights of third parties including affiliates and customers. We may also use your personal information to prevent suspected fraud, threats to our network or other illegal activities, prevent misuse or for any other reason permitted by law.
- **Update or correct our records.** We may receive personal information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine that personal information with other personal information we have about you to update our records. For example, we may obtain change of address information from public sources and use that personal information to update or correct your address.
- **Find locations on request.** Your location may be obtained from the mobile device or the network using your device's Global Positioning System (GPS) functionality or directly from you. We may use your location information to search for information including searching for an agent, searching for a service provider, identifying the location of an accident, or identifying the location of a roadside event you are reporting. If you do not want location information used, you can disable the GPS functionality on your mobile device.

We use sensitive personal information only as reasonably necessary to perform or maintain the services or provide goods you requested, to perform services on behalf of the business such as maintaining or servicing accounts, processing payments, to provide analytics services or similar services, to detect security incidents, resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for those actions, to ensure customers and other peoples' physical safety, for short-term use such as non-personalized advertising as part of our current interactions, to verify or maintain the quality or safety of service, improve, upgrade or enhance service, or other reasons that do not require an opt-out of this use.

We do not market any products or services to children under the age of thirteen or knowingly collect any information from children under the age of thirteen. We do not knowingly sell or share for cross-context behavioral advertising the personal information of consumers under the age of sixteen. Our website is not intended for children.

## **SHARING YOUR INFORMATION**

We do not sell your personal information. We also do not share personal information for cross-context behavioral advertising as defined under California law. We may share

your personal information with our affiliates for business purposes consistent with the uses described in this Privacy Statement. We may also share personal information about you with third parties whenever you consent to or direct such disclosure or sharing. We may share information with others in an aggregated or de-identified form that does not reasonably identify you. We strive to work with companies that share our commitment to privacy.

We may share any of the categories of personal information described above with service providers and other third parties for business purposes or as required or permitted by law including with:

- **Companies involved in insurance and other business transactions:** We share your personal information with other companies that play a role in an insurance transaction with you such as independent claims adjusters, repair shops, and other claims related companies. We may also share your personal information to participate in insurance support organizations.
- **Authorized agents or brokers:** We operate through agents and brokers who sell our services and products on our behalf. We may share your personal information with those agents or brokers to provide you with the services you've requested. They may use your personal information in the manner described in this Privacy Statement.
- **Service providers:** Personal information may be shared with service providers who perform services on our behalf for a business purpose including service providers that:
  - help complete transactions, handle a claim, service your policy or service your membership,
  - engage in credit reporting or payment processing,
  - provide marketing and advertising, email, or other communication services,
  - provide services that support our online activities including providing tracking technologies, web hosting and analytics,
  - provide tax and accounting, legal services, delivery, and data enhancement services,
  - provide technology services and enhance security, privacy, and fraud protections,
  - provide data analytics services or conduct research or actuarial studies, and
  - provide support to our operations.

- **Marketing and advertising partners:** We may also share personal and other information with service providers and third-party online advertising and marketing partners or permit these partners to collect personal information from you directly on our Sites to personalize online advertising. See the [Targeted Advertising](#) section below for details about these activities. We may share personal information with other financial institutions or other companies with whom we have a joint marketing agreement.
- **Third parties in connection with a business transaction:** Personal information may be disclosed to third parties in connection with a corporate transaction, such as a merger, sale of any or all of our company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by an affiliate or third party, or in the event of a bankruptcy or similar proceedings.
- **Law enforcement, regulators, and other parties for legal reasons:** Personal information may be disclosed to third parties, as required by law or subpoena, or if we reasonably believe such action is necessary to:
  - comply with the law and the reasonable requests of regulators, law enforcement, or other public authorities,
  - protect our or others safety, rights, or property, and
  - investigate fraud or to protect the security or integrity of our Sites or any product or services.

## HOW LONG WE KEEP YOUR INFORMATION

We retain personal information in accordance with applicable laws or regulatory requirements and also for as long as necessary to fulfill the purposes for which it was collected and to fulfill the business or commercial purposes that are explained in this Privacy Statement.

## COOKIES AND OTHER TRACKING TECHNOLOGIES

**Technologies and Information Collected:** When you visit our Sites, we and our service providers automatically collect information about your use of and access to these Sites. We collect this information through a variety of tracking technologies, including cookies, Flash objects, web beacons (also called pixel tags), embedded scripts, location-identifying technologies, and similar technology (collectively, “tracking technologies”). Information we collect automatically about you may be combined with other personal information we collect directly. The information collected in this manner includes:

- The website from where you accessed our Sites, where you went to when you left our Sites, how frequently you visit our Sites, your location when you access our Sites, when and whether you open emails or click the links contained in emails,

pages you visit and ads you view on our Sites, recordings of mouse clicks, mouse movements, keystrokes, and other communications you make on our Sites,

- Information about the computer, tablet, smartphone or other device you use, such as your IP address, browser type, Internet service provider, platform type, device type/model/manufacture, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device or your account (including, e.g., a persistent device identifier or an Ad ID), and other similar information,
- Analytics information collected by us or via third party analytics tools, to help us measure traffic and usage trends for the Sites and to understand more about the demographics and behaviors of our users, and
- How often you use a mobile app, from where the app was downloaded, events that occur within the app, aggregated usage, and performance data.

**Use of the Information:** The information collected through tracking technologies allows us to provide you with an improved, enhanced, and personalized customer experience, to monitor and improve our Sites and for other internal purposes such as:

- Remembering information so that you will not have to re-enter it during your visit or the next time you visit the Sites,
- Provide custom, personalized content and information, including targeted content, communications, and advertising,
- Identify and contact you across multiple devices,
- Provide and monitor the effectiveness of our Sites,
- Perform analytics and detect usage patterns on our Sites,
- Diagnose or fix technology problems, and
- Detect or prevent fraud or other harmful activities and
- Otherwise, to plan for and enhance our Sites.

Our service providers include Adobe and Google. To learn about Adobe Analytics privacy practices or to opt-out of cookies set to facilitate reporting, [click here](#). To learn more about Google's privacy practices, [click here](#). To access and use the Google Analytics Opt-out Browser Add-on, [click here](#).

**Your Choices Regarding Cookies:** If you prefer not to accept cookies, most browsers will allow you to manage cookies in your browser settings to disable or block cookies, remove existing cookies, automatically accept cookies or to notify you when you receive a cookie. Options available may vary by browser. However, if you disable, modify, or reject cookies, some parts or functionalities of our Site may be inaccessible or not

function properly. For example, disabling cookies may require you to repeatedly enter information to take advantage of services or promotions.

**Targeted Online Advertising and Do Not Track:** We or our marketing and advertising service providers may use information about your activities on our Sites or other websites to help tailor our advertisements or offers to what may interest you – also called interest-based advertising. The information is collected using the tracking technologies explained above.

You may continue to see generic or non-targeted ads about our products and services if you opt out of interest-based advertising. Although we do our best to honor the privacy preferences of our visitors, we do not respond to “Do Not Track” signals from your browser.

## **PRIVACY RIGHTS AND CHOICES**

Various federal and state laws provide privacy rights to consumers including the right to know, access, delete, or correct personal information, the right to opt-out of sharing of personal information with affiliates for marketing or the right to opt-out of receiving email marketing. These rights differ by state and also by the type of products and services you have with Encompass®.

## **INSURANCE CUSTOMERS’ RIGHTS AND CHOICES**

**Right to Access, Review and Correct Personal Information:** Encompass® insurance product customers can request to see or access their recorded personal information at any time. To do this, please contact your agent or send a letter to Encompass®, PO Box 3199 Winston-Salem, NC 27102-3199, with your request. Proper identification may be required to fulfill the request. If you believe our information is incomplete or inaccurate, you can request that we correct it, and we will make corrections if possible. Please note we may not be able to provide information relating to investigations, claims, litigation, and other matters. We will respond to all such requests within a reasonable time. We can’t change information provided to us by other companies like consumer reporting agencies. You will have to contact them directly.

You may also update, delete, or modify your account profile information at any time by logging into your online account and making updates, or you may call us to correct the information.

**Personal Information Sharing Preferences:** We would like to share your personal information with one or more of our affiliates and trusted nonaffiliated companies in order to make you aware of different products, services and offers they can provide. However, you can request that Encompass® not share your personal information with these companies for marketing products and services. For information about Encompass® affiliates, see the [Affiliates](#) section at the end of this Privacy Statement.

To request that we not share your information with our affiliates or nonaffiliated companies to market their products and services, you may log on to your account at any time and select “Yes” as your “Marketing Opt-Out” choice. You may also mail your completed Privacy Choices form provided with your annual privacy notice or contact your agent for assistance. Please keep in mind that it may take up to four weeks to process your request. If you previously contacted us and asked us not to share your personal information in this way, your previous choice still applies, and you do not need to contact us again. If you would like to change your previous choice, you may change it through your online account or by contacting your agent for assistance.

## **STATE SPECIFIC PRIVACY RIGHTS AND CHOICES**

### **California Residents:**

California residents have certain rights under California Consumer Privacy Act (CCPA) to access, correct and delete personal information, and other rights described below. Similar rights exist for Texas residents for some of the personal information we collect.

**Right to Know and Access Your Personal Information:** You have the right to request the specific pieces of personal information we have collected about you and the right to know:

- the categories of personal information we’ve collected,
- the categories of sources from which personal information was collected,
- the business purpose for collecting the personal information, and
- the categories of third parties with whom we disclose or share personal information.

**Right to Deletion of Personal Information:** You have the right to request deletion of personal information collected from you, subject to certain exceptions including that we need the personal information to:

- Complete a transaction or provide a good or service you requested, service your account, or take other actions reasonably anticipated or aligned within the context of our ongoing business relationship,
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities,
- Comply with a legal obligation, or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

**Right to Correct Personal Information:** You have the right to request we correct any inaccurate information we have about you. We may request that you provide

documentation to support your request and we will correct your information unless we determine that the personal information is more than likely accurate.

**Non-Discrimination Rights:** We don't discriminate against you if you exercise any of the privacy rights described in this privacy statement.

**Verified Requests:** To protect you and your personal information, we will only respond to requests to know, access, delete or correct that we have been able to properly verify through our authentication processes. To verify your identity, you will be asked to provide several pieces of personal information, such as name and demographic information, which we only use to verify your identity or authority to make the request.

**Submitting a Request:**

To submit a request regarding your insurance information, follow the process in the [Insurance Rights](#) section above. *Personal insurance information will not be processed as part of a CCPA request.*

To submit a CCPA request, please visit the [Access/Deletion/Correction webform](#) or call us at 1-866-622-1979.

Responses to a verified request may take up to 45 calendar days or longer depending on the nature of the request. If additional time is needed, we will notify you of the additional time. We may only respond to two access requests within a 12-month period. Requests from authorized agents must be submitted via the same webform or toll-free number, but to protect your privacy, consumers are required to verify their identity directly with us.

Click [here](#) to view California Consumer Request Metrics.

**Montana Residents:**

Pursuant to Montana law, you may request a record of any disclosure of your medical information during the preceding three years. Please send requests to: Encompass®, PO Box 3199, Winston-Salem, NC 27102-3199.

**Vermont Residents:**

We won't share your personal information with Encompass® companies for marketing purposes except as allowed by Vermont law.

**OTHER PRIVACY CHOICES**

**Email Marketing Choices and Other Notifications:** We may send you email marketing communications about products, features and services that may be of interest to you. To opt out from receiving marketing and promotional emails from us, please click the unsubscribe link located at the bottom of each communication. If you opt out from receiving marketing emails, we may still send you non-marketing emails such as emails

about your products or services, responses to your requests and inquiries, or notices of updates to terms and conditions or our privacy practices.

If you use the MyEncompass online access, or the mobile app, you can also manage email, other notifications, and marketing preferences through these applications.

## **SOCIAL MEDIA, LINKS AND EXTERNAL SITES**

Links to other company's websites may be provided on the National General Sites as a convenience to you. If you choose to go to these external websites, you will be subject to the privacy practices of those external websites; National General is not responsible for the privacy practices of those websites. We encourage you to be aware when you leave our Site to read the privacy policies or statements of every website you visit, as those privacy policies or statements may differ from ours. Our Privacy Statement applies solely to the Sites where this Privacy Statement appears.

Our website may include Social Media features, such as the Facebook Like button and widgets, such as the Share This button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the feature to function properly. Social Media features and widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy policy of the company providing it.

## **SECURITY**

Protecting your personal information is important to us. We use a combination of reasonable technical, administrative, and physical safeguards to protect your personal information. However, no website, mobile application, database, or system is completely secure or "hacker proof." So, we cannot guarantee its absolute security. You are also responsible for taking reasonable steps to protect your personal information against unauthorized disclosure or misuse.

We limit access to your personal information to those who need it to do their jobs. We comply with all applicable federal and state data security laws.

## **CONTACT US**

Please note that the privacy team cannot assist with policy-related requests. If you should have questions or concerns about our privacy practices, please contact us at [1-844-874-3609](tel:1-844-874-3609).

## **CHANGES TO OUR PRIVACY STATEMENT**

We may periodically update or revise this Privacy Statement. The effective date at the top of the document shows when this Privacy Statement was last revised. We will let

you know when we update the Privacy Statement by changing the date or other appropriate means.

## **AFFILIATES**

This Privacy Statement describes the privacy practices of Encompass® and its affiliates whose websites and mobile apps link to this Privacy Statement.

Personal information may be shared for marketing purposes among Encompass® and Encompass®'s affiliates linking to this Privacy Statement as well as other affiliated companies that have separate online privacy statements. To see the list of affiliated companies, click [here](#).