

**National General Holdings Corp.
Privacy Policy - California Residents**

National General Holdings Corp. (“We,” “Us,” and “Our”) are giving you (“You,” “Your”) this notice pursuant to the requirements of the California Consumer Privacy Act of 2018 (“CCPA”) to inform You how We may collect and share nonpublic Personal Information about You and any accounts You may have or had with a company (or companies) in the National General Holdings Corp. Those companies are listed at the end of this notice.

This notice also advises You of Your right, under certain circumstances, to keep this information from being shared by Us with the following:

1. Our business affiliates, or
2. Other business associates (including non-affiliated companies) with whom We do business

To provide financial and insurance products and services, and Your right to limit sharing of and marketing related to such information, in some cases.

The first portion of this notice describes the types of “Personal Information” We collect, followed by a description of Your rights to request that We take, or not take, certain actions with respect to personal Information and how to exercise those rights. Please review this notice carefully.

Sources of Nonpublic Personal Information We Collect about You

We collect nonpublic Personal Information about You and the members of Your household from multiple sources including:

1. Information We receive from You, such as information on applications or other forms, which may include Your name, address, email address, age, social security number, driving history, property history, claims history and health information.
2. Information about Your transactions with Us, Our affiliates, or others, such as Your account balance and payment history.
3. Information We receive from outside sources such as consumer reporting agencies, insurance agencies, state motor vehicle departments, and as part of Our data integration services and digital marketplace. This type of source may provide information on Your credit history, credit score, driving and accident history, or prior insurance coverage that You have obtained, including claim history, information related to claims for benefits or coverage under a policy We issue, whether or not You are Our customer. In relation to Our health insurance business, We also receive information from physicians, hospitals, medical professionals, other health care providers, and other sources related to health care and health history. Please note that the information obtained from outside sources may be retained by those outside sources and disclosed to other persons without Our knowledge.
4. Information about Your computer hardware and software that may be collected by Us if You contact Our websites directly or through another website or link. This information can include: Your IP address, browser type, domain names, access times, geographic location, and referring website addresses. This information is used for the operation of the website, to maintain quality of the website, and to provide general statistics regarding use of Our websites.

Personal Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked – either directly or indirectly – with a particular Consumer (“Personal Information”). In particular, We have collected the following categories of Personal Information from Consumers within the last twelve (12) months:

Category	Examples	Collected
1. 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.	YES
2. Information 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, passport 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	YES

	information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	
3. Protected Classification Characteristics under California or Federal Law	Age, race, color, ancestry, 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, veteran or military status, genetic information (including familial genetic information).	YES
4. Commercial Information	Records of real or personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
5. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
6. Internet or Other Similar Network Activity	Browsing history, search history, information on a Consumer's interaction with a Website, application, or advertisement.	YES
7. Geolocation Data	Physical location or movements.	YES
8. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
9. Professional or Employment Related Information	Current or past job history or performance evaluations.	YES
10. Nonpublic Education Information Pursuant to the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
11. Inferences Drawn from Other Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

“Personal Information” does not include:

1. Information from government and other sources' records made available to the public.
2. De-identified or aggregated consumer information, meaning all personally-identifiable characteristics have been removed from such information before sharing or disclosing.
3. Information excluded from the scope of CCPA, such as:
 - a) 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;
 - b) Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the federal Gramm-Leach-Bliley Act (GLBA), the California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994 (DPPA).

How We Protect the Information that We Collect about You and Your Accounts

To protect the privacy and security of nonpublic Personal Information We collect about You, We restrict access to the information to Our employees, affiliates, agents and subcontractors who need this information to provide products and services to You. We maintain physical, electronic, and procedural safeguards that comply with applicable federal and state laws and regulations to guard Your nonpublic Personal Information. We strive to keep Our information about You accurate. We require those individuals to whom We permit access to Your customer information to protect it and keep it confidential. You may review the information We have collected on Your account, and if You inform Us of an error, We will update Our

records promptly. If You wish to correct Personal Information on Your account, please contact Your insurance agent or a customer service representative at the contact information on Your billing statement.

Use and Disclosure of Personal Information to Affiliates and Non-Affiliates

We disclose Personal Information to Our business affiliates and subsidiary partners, vendors, service providers, advertisers, and other third parties to provide You with superior service and to inform You of product and service opportunities that may be of interest to You. Some of Our affiliates may disclose information for other business or commercial purposes. We may share any of the nonpublic Personal Information We collect about You and Your accounts, as described above, as permitted by law. Our sharing of information about You is subject to Your Rights, detailed in this policy. We may use or disclose the Personal Information We collect for one or more of the following business purposes including the examples noted below:

Business Purpose	Examples
1. Performing Services	<ul style="list-style-type: none"> a. To fulfill the reason for which You provide Us the information, such as quoting premiums, underwriting insurance, servicing insurance policies, and adjusting claims. b. To provide You with information, products, or services that You request from Us or any of Our authorized representatives, such as insurance agents and claims adjustors. c. To provide You with email alerts, web portal registrations, and other notices concerning Our products or services, or to provide other related information or news that may be of interest to You. d. To carry out Our obligations and enforce Our rights arising from any contracts entered between You and Us, including for billing and collections.
2. Security	To protect the rights, property, or safety of Us, Our clients, or others as necessary or appropriate.
3. Certain Short-term Uses	To improve Our interactions with You, e.g. during Your visit to one of Our websites.
4. Auditing	<ul style="list-style-type: none"> a. To improve Our websites and operational procedures. b. To enhance Your experience with Our products and communication. c. To provide required information for internal and external audits for regulatory, legal, financial, technical, and operational compliance.
5. Internal Research for Technical Development	<ul style="list-style-type: none"> a. For developing new technological solutions, improve efficiency and effectiveness of operations, and maintain products at or above industry standards. b. To improve customer experience when interacting with staff and utilizing Our services.
6. Debugging	Identifying and repairing errors in Our products, services, and related systems.
7. Quality and Safety Maintenance and Verification	<ul style="list-style-type: none"> a. To assure accessibility and usability of Our services and products as required by state and federal law. b. To comply with data security and privacy standards and protect sensitive information from unauthorized access.
8. Operational and Other Purposes	<ul style="list-style-type: none"> a. To participate, as permitted by law, in academic and non-profit policy research. b. To respond to law enforcement or regulatory agency requests, as required by applicable law, court order, or government regulations. c. To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets or subsidiaries, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Us is among the assets transferred. d. To fulfill the purpose as otherwise described to You at the time We collect Your Personal Information, or as otherwise set forth in the CCPA.

	<p>e. To fulfill any of the above purposes on Your or Our behalf, We may disclose Your Personal Information to other businesses or government agencies such as:</p> <ul style="list-style-type: none"> i. Financial service providers, such as credit card issuers, insurance companies, and insurance agents. ii. Non-financial companies, such as credit reporting agencies, manufacturers, motor vehicle dealers, management companies, attorneys in fact, and telecommunication companies. iii. Companies that perform business or professional services, such as printing, mailing, data processing, analysis, or customer survey services, on Our behalf. iv. Other companies We do business with to offer or provide financial products and services to You.
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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 prior notice.

Disclosure, Sale, Rental or Leasing of Personal Information

We will disclose Your Personal Information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:

- 1. Conform to the requirements of the law or comply with legal process served on us;
- 2. Protect and defend Our rights or property;
- 3. Act under emergency circumstances to protect the personal safety of Our customers, or the public;
- 4. Assist in the underwriting and servicing of insurance policies written by Us or through non-affiliated parties;
- 5. Process insurance claims.

In addition, a limited number of Our affiliates sell, rent or lease Personal Information to non-affiliated third parties and service providers. We do this in order to make additional products and services available that may be of interest to You. You may request information about the Personal Information We have sold, rented or leased to others. See the section below entitled “Your Rights” or visit Our Consumer Privacy Portal at www.NGHCPPrivacy.com/ca-right-to-know.

YOUR RIGHTS

Your Choice to Limit Affiliate Marketing and Information Sharing

Federal law gives You the right to limit some but not all marketing from the companies in National General Holdings Corp. and its affiliates. You may limit companies in the National General Holdings Corp. and its affiliates from marketing their products or services to You based on nonpublic Personal Information about You that they receive from a company in National General Holdings Corp. This information includes income, account information, credit history, and payment history. Your choice to limit Affiliate Marketing will apply to nonpublic Personal Information about You and Your existing account.

Current National General customers may also opt out of non-commercial information sharing, such as with affiliates or other companies who may offer products and services of interest to You. You may direct the company with which You do business (i.e., the company You purchased Your policy from) not to share information with other National General Holdings Corp. affiliates or third-party companies (other than as required or permitted by law). Information sharing permitted by law includes, for example, sharing with companies that work for a company in National General Holdings Corp. to provide the product or services You request. Your information sharing opt out direction will apply to nonpublic Personal Information, as described above, that the company in National General Holdings Corp. has collected about You and Your existing account.

You may make Your choice at any time. Your choice will remain unchanged until You state otherwise. However, if We do not hear from You, We may share some of Your information with affiliates and with other companies with whom We have contracts to provide products and services.

For instructions on how to exercise Your rights to limit affiliate marketing and information sharing, please contact Your agent or refer to Your most recent statement for additional options to contact us.

Frequency of Notification of Your Privacy Rights

Each time You establish a new account with a company of National General Holdings Corp., You will receive a privacy notice and an opportunity to opt out of information sharing and limit affiliate marketing for that account, as permitted by law. If You have a joint account with another person, either of You may opt out of information sharing or limit affiliate marketing (other than as permitted by law) for both of You.

Your Right to “Opt-Out” of Our Sale of Your Personal Information

You have the right to prohibit Us from selling Your Personal Information. You may exercise this right at any time. Once We have processed Your verifiable request, We will not sell Your Personal Information unless We receive Your express consent to do so.

The sale of the personal information of minors under the age of 16 is prohibited without prior consent. This consent, known as an “Opt-In,” must be given by a parent or guardian for minors under the age of 13. Minors between ages 13 and 15 must provide their own consent.

For more information about Your Right to Opt Out, visit Our Consumer Privacy Portal at www.NGHCPrivacy.com/ca-do-not-sell-my-info or call Us at 833-303-2724.

Your Right to Know

You have the right to know specific things about Personal Information We might have about You. You can request that We provide You with the following information:

1. The categories of Personal Information We collected about You;
2. The categories of sources for the Personal Information We collected about You;
3. Our business purpose for collecting or selling that Personal Information;
4. The categories of third parties with whom We share that Personal Information;
5. The specific pieces of Personal Information We collected about You.

Additionally, if We sold or disclosed Your Personal Information for a business purpose, We will provide, in two separate lists:

1. The categories of Personal Information that We sold and the categories of third parties that purchased the Personal Information;
2. The categories of Personal Information that We disclosed about You for a business purpose and the categories of third parties to whom We disclosed Your Personal Information.

If We did not sell and/or disclose Your Personal Information, We will provide You with a statement that confirms this.

The above right applies to Your Personal Information from the previous 12 months from the date We receive Your request to know. Before We can disclose this information to You, We must verify Your identity and the request.

For more information about Your Right to Know, visit Our Consumer Privacy Portal at www.NGHCPrivacy.com/ca-right-to-know or call Us at 833-303-2724.

Your Right to Request Deletion of Personal Information Collected from You

You have the right to request that We delete Your Personal Information that We collected from You and retained. Our fulfillment of Your request is subject to certain exceptions including those listed below. If no exception applies, once We receive and verify Your request, We will delete (and direct Our Service Providers to delete) Your self-provided Personal Information from Our records.

Deletion Exceptions

We may deny Your deletion request if retaining the information is necessary for Us (or Our service providers) to:

1. 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, or otherwise perform Our contract with You.
2. Detect security incidents, or prosecute those responsible for such activities.
3. Protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

4. Debug products to identify and repair errors that impair existing intended functionality.
5. Exercise free speech, ensure the right of another consumer to exercise his or her free speech rights, or exercise another right provided for by law.
6. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
7. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
8. Enable solely internal uses that are reasonably aligned with Consumer expectations based on Your relationship with Us.
9. Comply with a legal obligation.
10. Make other internal and lawful uses of that information that are compatible with the context in which You provided it.

For more information about Your Right to Request Deletion, visit Our Consumer Privacy Portal at www.NGHCPrivacy.com/ca-right-to-delete or call Us at 833-303-2724.

Exercising Your CCPA Rights

To exercise Your Right to Know, Your Right to Request Deletion, or Your Right to Opt-Out of Our selling Your Personal Information, please submit a verifiable consumer request to Us by visiting Our Consumer Privacy Portal at www.NGHCPrivacy.com/ca-request or call Us at 833-303-2724.

Only You (or a person registered with the California Secretary of State that You authorize to act on Your behalf) may make a verifiable Consumer request related to Your Personal Information.

You may only make a verifiable consumer request twice within any 12-month period. Each verifiable Consumer request must:

1. Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected Personal Information or a verifiable authorized representative of said person.
2. Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it.

We cannot fulfill 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 consumer request to verify the requestor's identity or authority to make the request, to fulfill the request, if possible, and to ensure Our compliance with the CCPA.

Your Right to Non-Discrimination

We will not discriminate against You for exercising any of Your CCPA rights. Unless permitted by the CCPA, We will not:

1. Deny You goods or services.
2. Charge You different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
3. Provide You a different level or quality of goods or services.
4. Suggest that You may receive a different price or rate for goods or services or a different level or quality of goods or services.

Response Timing and Fulfillment

We will attempt to respond to verifiable Consumer requests within 45 days of receipt. If We require additional time (up to an additional 45 days, for a total of up to 90 days), We will inform You of the reason and of the extension period in writing.

If You have an online account with Us, We can deliver Our written response to that account.

If We do not deliver Our response via Your online account with Us, 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 Our receipt of the verifiable consumer request.

The response We provide will also explain the reason(s) We cannot comply with a request, if applicable.

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.

Modifications to Our Privacy Policy

We reserve the right to change Our privacy practices in the future, which may include sharing nonpublic Personal Information about You with nonaffiliated third parties, as permitted by law. We will occasionally update this Privacy Policy to reflect company and customer feedback as well as legal and regulatory changes. We encourage You to periodically review this Statement to be informed of how We collect, use, share, and protect Your Personal Information. Updates to this policy can be found at www.NGHCPPrivacy.com/ca-disclosure-overview.

Subsidiaries of National General Holdings Corp. as of 31 December 2019, include: National General Motor Club, Inc.; MIC General Insurance Corporation; National General Assurance Company; National General Insurance Company; National General Insurance Online Inc; Healthcare Solutions Team, LLC; Assigned Risk Solutions, Ltd.; Adirondack AIF, LLC; Adirondack Insurance Exchange; Mountain Valley Indemnity Company; New Jersey Skylands Management, LLC; New Jersey Skylands Insurance Association; Imperial Fire and Casualty Insurance Company; Imperial General Agency of Texas, Inc.; ABC Agency Network, Inc.; ABC Agency Network of Texas, LLC; Imperial Insurance Managers, LLC; Imperial Marketing Corporation; RAC Insurance Partners, LLC; National General Management Corp.; Integon Casualty Insurance Company; Integon General Insurance Corporation; Integon Indemnity Corporation; National Health Insurance Company; Integon National Insurance Company; Agent Alliance Insurance Company; National General Premier Insurance Company; Personal Express Insurance Services, LLC ; Integon Preferred Insurance Company; New South Insurance Company; National General Insurance Marketing, Inc; Clearside General Insurance Services; Velapoint, LLC; America's Health Care/RX Plan Agency, Inc.; National General Lender Services, Inc.; Seattle Specialty Insurance Services, Inc.; NGLS Insurance Services, Inc.; Newport Management Corporation; John Alden Financial Corp.; NSM Sales Corporation; Century-National Insurance Company; Western General Agency, Inc.; NGLS Adjusting, LLC; Standard Property and Casualty Insurance Company; Direct General Insurance Company; Direct General Insurance Company of Mississippi; Direct General Life Insurance Company; Direct Administration, Inc; Direct Brevard, LLC; Direct Bay, LLC; Direct Insurance Company; Direct National Insurance Company; Direct General Financial Services, Inc; Direct General Premium Finance Company; Direct General Insurance Agency, Inc; Right Choice Insurance Agency, Inc; Direct Adjusting Company, Inc.; Direct General Consumer Products, Inc; HealthCompare Insurance Services, Inc.; Quotit Corporation; AgentCubed, LLC; LeadCloud, LLC; Health Network Group, LLC; Syndeste, LLC; National Farmers Union Property and Casualty Company; Renuant, LLC; National General Re, Ltd.; NG Holdings LLC; Integon Properties, S.A. de C.V.; Integon Service Co, S.A. de C.V.; Allied Producers Reinsurance Company, Ltd.; 4455 LBJ Freeway LLC; IC Buildings Company LP; North Dearborn Building Company LP; National General Insurance Holdings, Ltd.; National General Holdings BM, Ltd.; National General Insurance Management, Ltd.; American Capital Acquisition Investments, S.A.; Tiger Capital, LLC; National General Holdings Luxembourg; 800 Superior, LLC; 1100 Compton, LLC.

Affiliates of National General Holdings Corp. include: companies in the National General Holdings Corp. referenced in this notice and companies that now or in the future control, are controlled by, or are under common control with a company in National General Holdings Corp.

