

PRIVACY POLICY

Last Updated: January 2025

This Privacy Policy explains how Insurance Data Services (“**IDS**,” “**us**,” “**we**,” or “**our**”) collects, uses, and discloses personal information we get through our website (www.insurancedataservices.net) and from conducting our business (together, our “**Services**”). We also describe your choices regarding our use of your personal information, the steps we take to protect your personal information, and how you can contact us about our privacy practices.

“**Personal information**” means any data that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person.

1. Personal Information We Collect

We collect and process personal information from or about the following categories of individuals:

- Visitors to our website
- Employees of our insureds and others with which we interact
- Claimants and related persons under insurance policies

We may collect, process, and store various types of personal information about you, depending on how you or your employer interacts with us. The following is a general summary of the personal information about you that we typically process, the sources of the personal information, and the purposes for our processing:

1.1. *Website Visitors*

If you use our website, we may collect personal information about your activities on our website (“**Website Data**”).

- *Information You Voluntarily Provide:* We collect personal information you voluntarily provide, such as when you submit an inquiry or request to us.
- *Information We Collect Automatically:* We use cookies to collect and store information about your interactions with our website, including information about your browsing behavior. Cookies are small files that a website transfers to your device through a web browser that enable the site’s or a third party’s systems to recognize your device and capture and remember certain information. Our website uses cookies that are required for its operation. Most browsers allow you to reject cookies. These settings will typically be found in the “options” or “preferences” menu of your browser. To find out more about cookies, including how to see what cookies have been set on your device and how to manage or delete them, visit www.aboutcookies.org or www.allaboutcookies.org. We do not monitor or take any action with respect to Do Not Track signals.

We process Website Data to operate and improve our Services.

1.2. Employees of Our Insureds and Others

We collect and process personal information about individuals employed by those we insure and other entities with which we interact from time to time, such as name, title, position, employer, email address, other business contact data, and similar relationship type data (“**Contact Data**”). Such Contact Data may also include details of your business interactions with us.

We may obtain Contact Data about you (i) directly from you, (ii) from others (for example, a referral or your employer), (iii) from other parties, such as government agencies, and (iv) from publicly available sources.

We process Contact Data for the purposes of obtaining services from vendors and third-party administrators, providing services to insureds, building and managing our relationships, and generally operating our business.

1.3. Claimants and Related Persons

In the course of managing insurance policies and processing claims, we may receive personal information provided by or on behalf of individual claimants and other persons, such as beneficiaries and dependents, in connection with those policies (“**Claimant Data**”). The scope and extent of the Claimant Data that we collect and process is typically determined by the client and the nature and scope of the claim. Claimant Data typically includes any personal information necessary to process a claim, such as contact information, information about the nature of the claim, health and medical information, professional or employment information, wage and salary details, demographic information, and information about insurance benefits.

We obtain Claimant Data directly from our insureds and from others that provide such information on behalf of our insureds, such as brokers and third-party administrators.

We process Claimant Data for the purposes of fulfilling our commitments under our insurance policies and managing our business obligations.

2. Sharing of Personal Information

We do not sell personal information or share it for targeted advertising. We may share selected personal information about you with the following parties or in the following circumstances:

- 2.1. Our Vendors** – We may share personal information about you with vendors and other business partners who perform services for us or on our behalf, for the purpose of carrying out such services. This includes vendors that assist in managing our organization, hosting or administering our website or electronic systems, and maintaining or analyzing data.

2.2. *Other Parties* – We may share personal information about you with insureds, regulators, legal counsel, experts, consultants, and other persons to the extent reasonably necessary or appropriate.

2.3. *Corporate Change* – We reserve the right to disclose and transfer personal information about you in connection with a merger, consolidation, restructuring, financing, sale, or other organizational change involving some or all of our assets.

2.4. *Legal Requirements and Law Enforcement* – We may disclose personal information about you when we believe that the law requires it; at the request of governmental authorities; pursuant to a court order, subpoena, or discovery request in litigation; to verify or enforce compliance with our agreements or policies and applicable laws, rules, and regulations; or whenever we believe disclosure is necessary to limit our legal liability or to protect or enforce our rights, interests, or security or those of others.

2.5. *Consent* – We may share personal information about you when you consent or request that we share the personal information.

3. Your Choices

3.1. *Unsubscribing from Email Marketing* – We generally do not send marketing email but, if you receive a marketing email from us and no longer wish to receive such emails, please click on the unsubscribe link in the relevant email or email us at dataprivacy@insurancedataservices.net.

3.2. *Privacy Rights*. The laws in some states, countries, and regions may give you specific additional rights related to your personal information. Depending on your location or residency, you may have the right to ask that we do one or more of the following:

- Give you details about our use of your personal information
- Let you access the specific personal information we have about you
- Transfer a copy of your personal information to you or someone else you select
- Delete all or some of your personal information
- Limit or restrict our use of your personal information
- Allow you to object to, opt out of, or withdraw your consent to our use of your personal information
- Object to our reasons for processing personal information

Please note that privacy rights requests will generally be subject to an identity verification process. We may ask you for specific information to help us confirm your identity prior to processing your request. Please follow any instructions provided and promptly respond to any follow-up inquiries so that we may confirm your identity and respond to your request. If you ask that we give you specific pieces of personal information or that we delete or correct certain types of personal information, we may apply heightened verification standards, which can require additional proof of your identity.

Only you, or someone you authorize to act for you, may make a request related to your personal information. If you designate someone else to make a request for you, we may still need to verify your identity directly with you before your request can be processed.

You, or someone you authorize, can submit privacy rights requests by sending us an email at dataprivacy@insurancedataservices.net. We will not discriminate against you for exercising your lawful privacy rights. If you want to submit a complaint or appeal our decision related to your privacy rights request, you may contact us using the information above or respond to any email communication from us responding to your privacy rights request. We will do our best to address and resolve your questions or concerns.

4. Security of Personal Information

We have implemented appropriate technical and organizational measures to help ensure (i) a level of security suitable to the risks presented by our processing of personal information and (ii) the ongoing confidentiality, integrity, availability, and resilience of our systems and Services.

5. How Long We Keep Your Personal Information

We keep your personal information for as long as necessary or permitted for the purposes described in this Privacy Policy or otherwise authorized by law. This generally means holding the personal information for as long as one of the following apply:

- Your personal information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information.
- Your personal information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal information was collected.
- The personal information is reasonably necessary to protect or defend our rights or property.

Where personal information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

6. Data Privacy Framework Participation

IDS participates in and complies with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (together, the “**DPF**”) as set forth by the U.S. Department of Commerce. IDS has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (“**DPF Principles**”) with regard to the processing of personal information received from the European Union, from the United Kingdom, and from Switzerland in reliance on the DPF. If there is any conflict between the terms in this Privacy Policy and the DPF Principles, the DPF Principles shall govern as to the personal information received in reliance on the DPF. To learn more about the DPF and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

IDS is responsible for the compliant processing of personal information received in reliance on the DPF, including for processing by its vendors and business partners in receipt of such personal information. The U.S. Federal Trade Commission has jurisdiction over IDS regarding its DPF compliance.

IDS is committed to resolving complaints about our processing of personal information received in reliance on the DPF. Please direct your concerns to dataprivacy@insurancedataservices.net in the first instance. If we cannot resolve your concern, IDS will cooperate and comply with the advice of the panel of European Union data protection authorities established to adjudicate unresolved complaints or the UK Information Commissioner's Office or the Swiss Federal Data Protection and Information Commissioner as relevant. You also may, in some circumstances, be able to invoke binding arbitration if your concern regarding our DPF compliance cannot be resolved by any other method.

7. Changes to the Privacy Policy

IDS reserves the right to modify or amend this Privacy Policy at any time. The current version of the Privacy Policy will be published on our website.

8. How to Contact Us

For any questions about this Privacy Policy or about your privacy rights and our privacy practices, we can be contacted as follows:

By email: dataprivacy@insurancedataservices.net

By phone: 1-877-270-1126