

Privacy Policy

Effective: June 1, 2022
Last Updated: June 1, 2022

This Privacy Policy (this "Policy") describes how Acrisure Title Holdings, LLC and its affiliates, including the Acrisure Title Agencies with whom you are doing business (collectively, "Acrisure," "we," "us" or "our"), collect, use, share, and safeguard personal information of consumers. This Policy also tells you about your rights and choices with respect to your personal information as a consumer, and how you can reach us to get answers to your questions. We may process your personal information through your online and offline interactions with us (collectively, the "Services").

Please read this Privacy Policy carefully. Using the Services and providing the related personal information is voluntary, and by accessing or using the Services, you: (i) acknowledge that you have read and understood this Privacy Policy; and (ii) agree that your access to and use of the Services are subject to the Privacy Policy and related Terms of Use.

Types of Information We May Collect

The following table provides examples of the types of information that we may collect from you and how we may use that information.

Context	Types of Information	Primary Purpose for Collection and Use of Information
Account Registration	We may collect your name and contact information if you create an account to manage your policy. We may also collect information relating to the actions that you perform while logged into your account.	We have a legitimate interest in providing account related functionalities to our users. Accounts can be used for easy checkout, policy administration, and to save your preferences and transaction history.
Consumer Information	We may collect your name, phone number, postal address, email address, driver's license number, date of birth, Social Security Number, marital status, payment information, and policy information (e.g., policy number, policy type, coverage(s) and limit(s)) and underwriting, exposure or claims-related data, to the extent available.	We have a legitimate interest in collecting this information from consumers in order to accurately provide them with insurance products and services and to communicate with them concerning normal business administration such as policy servicing and billing.
Cookies and First Party Tracking	We may use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a website is viewed, and clear GIFs are a type of picture file that can be used to store or send data.	We have a legitimate interest in making our websites operate efficiently.
Cookies and Third Party Tracking	We may participate in behavior-based advertising, which means that a third party uses technology (e.g., a cookie) to collect information about your use of our websites so that they can provide advertising about products and services tailored to your interests on our websites, or on other websites.	We have a legitimate interest in engaging in behavior-based advertising and capturing websites' analytics.
Email Interconnectivity	If you receive email from us, we may use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We have a legitimate interest in understanding how you interact with our communications to you.
Feedback/Support	If you provide us feedback or contact us for support, we will collect your name and email address or postal address, as well as any other content that you send to us, in order to reply.	We have a legitimate interest in receiving, and acting upon, your feedback or requests for support.
Joint Ventures	We may collect Consumer Information (described above) and other relevant or related information from parties with whom we have a joint venture(s) in order to deliver you products or services that may be applicable or of interest to you.	We have a legitimate interest in providing consumers with products or services that they are seeking to purchase or may have an interest in purchasing.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address.	We share information about our products and services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about our products or services.
Mobile Devices	We may collect information from your mobile device such as unique identifying information broadcast from your device when visiting our websites or when visiting one of our locations.	We have a legitimate interest in identifying unique visitors, and in understanding how users interact with us on their mobile devices.
Surveys	When you participate in a survey, we collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We have a legitimate interest in understanding your opinions, and collecting information relevant to our organization.
Sweepstakes or Contests	When you participate in a sweepstakes or contest we collect information about you, including contact information, to notify you if you are selected.	We have a legitimate interest in operating the sweepstakes. In some contexts we are also required by law to collect information about those that enter into our sweepstakes, and we have a legitimate interest in complying with those laws.
Website Interactions	We may use technology to monitor how you interact with our	We have a legitimate interest in understanding how you

	websites. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	interact with our websites to better improve them, and to understand your preferences and interests in order to select offerings that you might find most useful. We also have a legitimate interest in detecting and preventing fraud.
Web Logs	We may collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click activity, referring website(s), and/or a date/time stamp for visitors.	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.

In addition to the information that we may collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources.

Use and Processing of Information

In addition to the purposes and uses described above, we may use information in the following ways (among others):

- To identify you when you visit our websites.
- For everyday business purposes, such as account management, contract management, website administration, corporate governance and reporting obligations.
- To provide you insurance products or services.
- To provide you non-insurance products or services that may be of interest.
- To improve our services and product offerings.
- To process payments.
- To conduct analytics.
- To respond to inquiries related to support or other requests.
- To send marketing and promotional materials, including information relating to our products, services, sales, or promotions or those of a third party.
- To comply with laws and regulations and legal processes.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you obtain a title insurance policy through us, we may collect your information to provide our title agency services to you, but we may also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your policy. Alternatively, if you receive Services from us, we may collect your information so that we may provide such Services, but we may also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about these Services. As a result, our collection and processing of your information is based on different contexts, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business. We do not use your information to seek, obtain or furnish consumer reporting data or consumer reports, and we do not consider personal information provided to us to be a consumer report if the exclusions from the definition of consumer report in section 603(d)(2)(A) of the Fair Credit Reporting Act did not apply.

Sharing of Information

In addition to the specific situations discussed elsewhere in this Policy, we may disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with our corporate affiliates (e.g., parent company, sister companies or subsidiaries, and other companies under common control) or joint ventures to which we are a party. If another company acquires, or plans to acquire, all or a portion of our company, business, or assets, we may also share information with that company, including at the negotiation stage.
2. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this Policy.
3. **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights; to defend against or bring a legal claim; to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies; or to comply with your request for the shipment of products to or the provision of services by a third party.
4. **Partner Promotion.** We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third-party partner, the information that you provide will be shared with us and with them. Their use of your information is not governed by this Policy.
5. **Service Providers.** We may share your information with service providers. Among other things, service providers may help us to administer our websites, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.
6. **Sharing with Affiliates and Non-Affiliates for Marketing and Other Purposes.** We may share your information with affiliates and non-affiliates for marketing and other purposes. Under certain circumstances, you may opt-out of such sharing with respect to certain data you have provided to us. Please refer to the individual Privacy Notice(s) received from us for information relating to the sharing of your personal information. In addition, California residents may opt-out of the sharing of certain information with affiliates of Acisure by using one of the methods listed below under "Contact Information."

Your Choices and Rights

Depending on where you live, you may have certain rights with respect to your personal information. You may be able to make the following choices regarding your personal information:

1. **Access to Your Personal Information.** You may request access to your personal information by contacting us at the address described below. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. Note that if you are a California

resident, you have the right to request access to your personal information and may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing.

2. **Changes to Your Personal Information.** We rely on you to update and correct your personal information. You may be able to modify or delete your account profile on our website(s). If our website(s) do not permit you to update or correct certain information, you can contact us at the address described below in order to request that your information be modified. Note that we may keep historical information in our backup files as permitted by law.
3. **Deletion of Your Personal Information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law. In certain jurisdictions, you may have the right to request the deletion of your personal information. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes. Note that if you are a California resident, you have the right to request deletion of your personal information, though we do not guarantee that such request will be granted in every instance.
4. **Online Tracking.** We may recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
5. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in emails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
6. **Promotional Mailings.** If at any time you do not want to receive offers and/or circulars from us, you can remove yourself from our mailing lists by emailing us (our contact information is below) with "NO SNAIL MAIL" in the subject line, along with your name, address and zip code. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
7. **Promotional Text Messages.** If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by replying "STOP."
8. **Revocation of Consent.** If you revoke your consent for the processing of personal information, then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us at the address described below.

How to Submit a Request

To submit a request to access, or delete your personal information, please contact us by one of the methods listed below under "Contact Information." Please note that we must be able to verify your identity to make sure you are the person about whom we have collected personal information or an authorized representative. Depending on the type of request, we may conduct the verification process by email or phone using information that matches our records. The information you must provide as part of the verification process may include: name, contact information (such as email address or phone number), relationship with us, and residency. We may also ask for additional information as needed based on your relationship with us. You may also designate an authorized agent to submit a request on your behalf to access or delete your personal information. To do so, you must (1) provide that authorized agent written and signed permission to submit such request, and (2) verify your own identity directly with us. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized to submit such request.

In some cases we may limit or deny your requests to access, or delete your information. This may occur because the law permits or requires us to do so, or if we are unable to adequately verify your identity. Please note, if you elect to exercise one of your choices listed above, you will not receive discriminatory treatment by us for exercising your privacy rights that are conferred upon you by law.

How We Protect Personal Information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites may permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account by using one of the methods listed below under "Contact Information."

Other Important Information

The following additional information relates to our privacy practices:

- **Transmission of Information to Other Countries.** As an international company, we transmit information between and among our affiliates. As a result, your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible, we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. By submitting your personal information to us, you agree to the transfer, storage and processing of your information in a country other than your country of residence. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction, you can contact us using the contact information below.
- **Children's Privacy.** We do not knowingly collect any personal information from children under the age of 13 years. Our websites are directed to persons who are at least 13 years of age. If a parent or guardian is made aware that a child under the age of 13 has provided us with personal information through any point of contact, we ask to be contacted at the below email address, and we will delete the information about the child referenced from our files. If we have actual knowledge that personal information about a person under the age of 13 has been collected without appropriate parental consent, then we will take the appropriate steps to delete such information. We do not sell the personal information of minors less than 16 years of age without affirmative authorization.
- **Third Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Changes to This Policy.** We may change our Policy and practices over time. To the extent that our Policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your express or implied consent

to the new privacy policy. Our Policy includes an “effective” and “last updated” date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.

- **Information for California Residents.** California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of information are collected, “sold” or transferred for an organization’s “business purpose” (as those terms are defined under California law). We do not “sell” information as that term is defined under California Law. You can find a list of the categories of information that we collect and share below. Please note that because this list is comprehensive, it may refer to types of information that we share about people other than yourself. If you would like more information concerning the categories of your personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing, please submit a written request to us using the information in the "Contact Information" section below. California residents may have a right to not be discriminated against for the exercise of certain rights under this policy; we do not discriminate against California residents who exercise any of their rights described in this Policy.

Contact Information

If you have any questions, comments, or complaints concerning our privacy practices, or, where required by law, if you would like to submit a request based on a right listed in this Policy, please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

Acrisure, LLC
100 Ottawa Avenue SW
Grand Rapids, MI 49503
Attn: Acrisure Privacy Office
acrisureprivacyoffice@acrisure.com
877-504-9487
www.acrisure.com/privacy-policy/privacy-requests

California Information Sharing Disclosure

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to types of information that we collect and share about people other than yourself.

Categories of Personal Information We Collect	To Whom We Disclose Personal Information for a Business Purpose
<p>Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, social security number, driver’s license number, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Affiliates • Agency management system vendors • Claims adjusters • Data center/host/cloud-service providers • Electronic signature/consent facilitation vendors • Government entities, as may be needed to comply with law or prevent illegal activity • Insurance carriers • Internet service providers • Joint marketing partners • Managing general agents • Managing general underwriters • Operating systems and platforms • Other Service Providers • Professional services organizations, this may include auditors and law firms • Program administrations • Third parties who assist with information technology and security programs • Wholesale insurance brokers
<p>Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) – this may include signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information.</p>	<ul style="list-style-type: none"> • Affiliates • Government entities, as may be needed to comply with law or prevent illegal activity • Insurance carriers • Third parties who assist with information technology and security programs
<p>Characteristics of protected classifications – this may include age, sex, race, ethnicity, physical or mental handicap, etc.</p>	<ul style="list-style-type: none"> • Affiliates • Government entities, as may be needed to comply with law or prevent illegal activity • Insurance carriers • Third parties who assist with information technology and security programs
<p>Commercial information – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Affiliates • Agency management system vendors • Claims adjusters • Managing general agents • Managing general underwriters • Third parties who assist with information technology and security programs • Wholesale insurance brokers
<p>Internet or other electronic network activity information – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> • Affiliates • Government entities, as may be needed to comply with law or prevent illegal activity • Insurance carriers • Third parties who assist with information technology and security programs
<p>Audio, electronic, visual, thermal, olfactory, or similar information</p>	<ul style="list-style-type: none"> • Affiliates • Government entities, as may be needed to comply with law or prevent illegal activity • Insurance carriers • Third parties who assist with information technology and security programs
<p>Non-public education information (as defined in the Family Educational Rights and Privacy Act)</p>	<ul style="list-style-type: none"> • Affiliates • Government entities, as may be needed to comply with law or prevent illegal activity • Insurance carriers • Third parties who assist with information technology and security programs
<p>Inferences drawn from any of the information listed above</p>	<ul style="list-style-type: none"> • Affiliates