

# SHELTERPOINT ONLINE PRIVACY POLICY

Effective Date: July 12, 2018

## I. Our Online Privacy Policy

ShelterPoint Life Insurance Company, a New York corporation on behalf of itself and ShelterPoint Insurance Company, a Florida corporation as the wholly-owned subsidiary of ShelterPoint Life Insurance Company (collectively the "Company" "we" or "us") respects your privacy and is committed to protecting your privacy when you visit websites owned or operated by the Company or when you utilize mobile applications provided by the Company (collectively, the "Services"). This online privacy policy ("Privacy Policy") describes:

- The types of information we may collect from you or that you may provide us.
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect through the Services. This Privacy Policy DOES NOT apply to information that:

- We collect offline or through any other means.
- You provide to or is collected by any third party, including through any application or content that may link to or be accessible from or on the Services. These third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

This Privacy Policy is subject to the terms of our Corporate Privacy Policy, which is available at <https://www.shelterpoint.com/corporate/privacypolicy.aspx> and is incorporated into this Privacy Policy. In the event of a conflict between this Privacy Policy and the Corporate Privacy Policy, the terms of the Corporate Privacy Policy will control.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not access or use the Services. **By accessing or using the Services, you accept and agree to be bound and abide by this Privacy Policy.**

## II. Changes to Privacy Policy

This Privacy Policy may change from time to time, and you are responsible for checking this Privacy Policy periodically for updates when accessing or using the Services. The date the Privacy Policy was last revised is identified at the top of the page. If we make material changes to how we treat your personal information, we will notify you through a notice on the Services. **Your continued use of the Services after we make changes to this Privacy Policy is deemed to be your acceptance of those changes.**

## III. Information We Collect and How We Collect It

We collect several types of information from and about users of our Services, including information:

- By which you may be personally identified, such as your name, address, email address, telephone number(s), social security number, or any other identifier that can be used on its own or with other information to identify, contact or locate you ("personal information").
- That is about you but individually does not identify you, such as marital status, physician information, employment information or geographic location.
- About your internet connection, the equipment you use to access our Services and other usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically when you access or use the Services.
- From third parties, including other vendors or business partners.

## IV. Information You Provide to Us

The information we collect on or through the Services may include:

- Information that you provide by filling in forms on our Services. This includes, but is not limited to, information you provide at the time you apply for coverage, submit a claim and/or at the time you contact us.
- Records and copies of your correspondence with us.
- Your responses to surveys or questionnaires that we might ask you to complete.

## V. Automatic Information Collection and Tracking

When you access and use the Services, we may use technology to automatically collect information to improve our Services and to deliver a better and more personalized service.

- **Usage Details.** When you access and use the Services, we may automatically collect certain details of your access to and use of the Services, including location data, length of time you visit the Services or specific pages, page views, click-stream information, location information, and other communication data and the resources that you access and use on or through the Services.
- **Device Information.** We may collect information about your device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, and network information.
- **Behavioral Tracking/Targeting.** We also may collect information about your activities over time or across third-party websites, apps, or other online services, commonly known as behavioral tracking. The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. We may use this information to enhance your experience using the Services or for internal reporting purposes.

## VI. Information Collection and Tracking Technologies

We use Google Analytics and other services provided by Google Inc. It uses cookies to collect, for example, information about the operating system and the browser that you use, your IP address, the website you previously accessed (referrer URL) and the date and time of your visit to the Services. On subsequent repeated visits to the Services, frequently used information is automatically displayed for you. We are able to track your usage patterns with the help of the cookies. The information generated by cookies about the use of the Services is transmitted to a Google server, which may be located within or outside of, the United States, and stored there. Google will use this information to evaluate your use of the Services. Google may transfer these rights to third parties insofar as it is required to do so by law or in order that data may be processed on Google's behalf. By accepting this policy, you consent to the processing of your data by Google.

## VII. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Services and their contents to you.
- To estimate usage patterns and customize the Services.
- To provide you with emails and other communications.
- To fulfill any other purpose for which you provide the information or express an interest. For example, information submitted through the Claim Portal will be used to process your claim.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our Services.
- To provide advertisements to you.
- In any other way we may describe when you provide the information, and for any other purpose with your consent.

## VIII. Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual or device, without restriction. In addition, we may disclose personal information that we collect or you provide:

- To our affiliates, contractors, service providers, and other third parties we use to support our operations. This may include disclosures to third party administrators who underwrite, administer policies or process claims on our behalf.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our users is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you provide us an email address to receive information, we will transmit emails to that email address.
- For any other purpose disclosed by us when you provide the information.
- For any other purpose, with your consent.

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply this Privacy Policy.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our employees or others.

Except as provided herein, personal information collected through the Services will not be sold or otherwise disclosed to third parties for direct marketing purposes.

## IX. Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. If you do not want us to collect your information, as described in this notice, do not use the Services. This section describes mechanisms we provide for you to control certain uses and disclosures of your information.

- **Tracking Technologies.** You can set your browser to refuse all or some cookies, or to alert you when cookies are being sent. To learn how you can manage your cookie settings, visit the Flash player settings page on Adobe's website or the website of your browser vendor. If you disable or refuse cookies or Flash cookies or block the use of other tracking technologies, some parts of the Services may then be inaccessible or not function properly.
- **Email and Solicitations.** When you contact us through certain forms on the Services, you may thereafter be added to our email list(s) to receive email messages. For example, if you contact us about an insurance product, we may email you to provide you with information about that product and the Company. At any time, you can choose to no longer receive such emails by using the "unsubscribe" method found at the bottom of each email or by sending us a return email stating your request.

You may also send us an email, give us a call, or write us a letter via the contact information provided in [Section XIV](#) of this Privacy Policy to specifically request to correct or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

## X. No Collection of Information from Children

Our Services are not intended for use by children under 13 years of age. We do not solicit or knowingly collect any information from visitors under 13 years of age, and please do not use the Services if you are not yet 13. If we learn we have collected or received personal information from a child under 13, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us immediately through the contact information found in [Section XIV](#) of this Privacy Policy.

## XI. "Do Not Track" Signals

For residents of Delaware, 6 Del.C. § 1205C seeks disclosure of how the Services respond to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information about their online activities over time and across third-party websites or online services. Although it is not clear that the statute applies, we believe that an example might be a browser option allowing you to ask websites not to track you across third-party websites so that they can serve targeted or behavioral advertising to you. The Services may collect personal information using behavioral tracking or associate personal information with other information collected using behavioral tracking. If your browser or similar mechanism gives the Services a "do not track" signal, the Website will not honor it because of the tracking described in "Information We Collect and How We Collect It". You should not use the Services if you desire a "do not track" signal, because the Services will not honor it.

## XII. Using the Services from Outside the United States

This policy is intended to cover collection of information on or via the Services from residents of the United States. If you are visiting the Services from outside the United States, please be aware that the data protection laws of other countries might not be as comprehensive as those in your country. By using the Services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.

## XIII. Data Security

We have implemented reasonable measures designed to secure your information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your information, we cannot guarantee the security of your information transmitted through our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

## XIV. Contact Information

To ask questions or to comment about this Privacy Policy or our privacy practices, please contact us. You may contact us in writing at the following address: 1225 Franklin Ave., Ste. 475, Garden City, NY 11530. You may also contact us via email at [customerservice@shelterpoint.com](mailto:customerservice@shelterpoint.com) or via phone at 800-365-4999.

# Corporate Privacy Policy

## Privacy at ShelterPoint Life Insurance Company

This notice explains the Privacy Policy of the ShelterPoint family of companies, which consists of ShelterPoint Life, a NY-domiciled carrier, and ShelterPoint Insurance, a FL-domiciled carrier (collectively, "ShelterPoint"). Maintaining policyholder privacy is a top priority for us at ShelterPoint. We care about the privacy of our policyholders and their employees. It is our company policy NOT to disclose or release any information about policyholders or insureds without express authorization.

We limit the collection and use of information to that required to provide quality service to our policyholders. Our privacy policy is sent to policyholders once annually in plain English. We apply the same privacy policies to former policyholders as to current policyholders.

Policyholders and claimants may access personal information (except when access is prohibited by law) by contacting:

### CUSTOMER SERVICES

Phone: (800) 365-4999 Email: customerservice@shelterpoint.com

We keep all policyholder files complete, up to date, and accurate. Policyholders may notify us of errors or changes by contacting Policy Services. We may amend our privacy policy and/or our notice as necessary.

## Our Policies and Practices to protect your Personal Information

### I. Information Security

ShelterPoint protects information we collect from policyholders by maintaining safeguards that meet the requirements of applicable law. ShelterPoint holds all information collected from policyholders and their employees in strict confidence. ShelterPoint employees DO NOT release any information about any policyholder or insured without an authorization signed by the insured and approved by a manager.

### II. Personal Information We Collect

ShelterPoint collects information in connection with processing applications, administering policies and processing claims. Where permitted by law, we collect information from licensed insurance brokers and agents in connection with the sale of our products. It is ShelterPoint policy NOT to release any information without a signed authorization from you.

### III. Your Ability to Opt In to Disclosure

You may request that we disclose information about you, your company or your employees. This means you must ask us (opt in) to disclose information to doctors, medical providers or other individuals or companies. We WILL NOT share any information with doctors or other individuals or companies without a signed authorization, unless required to do so by law or court order.

### IV. How to Opt In to Information Disclosure

If you would like us to release information to anyone who requests it without a signed authorization, please complete the form below and mail it to the administrative office of the ShelterPoint company that issued your policy:

ShelterPoint Life Insurance Company or ShelterPoint Insurance Company  
1225 Franklin Avenue, Ste. 475  
Garden City, NY 11530  
Attention: Privacy Compliance

**IF YOU DO NOT WANT YOUR INFORMATION RELEASED, YOU NEED TAKE NO ACTION**

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### PRIVACY OPT IN FORM

By completing the information requested below, I hereby provide notice of my election to opt in to disclosure of my personal information to any individuals, company or organization requesting it.

Name :

\_\_\_\_\_

Address :

\_\_\_\_\_

Telephone # (optional) :

\_\_\_\_\_

Social Security # :

\_\_\_\_\_

Policy Number(s) :

\_\_\_\_\_

Issuing Company :



ShelterPoint Life Insurance Company



ShelterPoint Insurance Company