

Amynta Agency, Inc., California Privacy Notice

Effective Date: December 1, 2020

This California Privacy Notice (“**Notice**”) applies to “Consumers” as defined by the California Consumer Privacy Act (“**CCPA**”) as a supplement to Amynta Agency, Inc., (or any of its subsidiaries or associated entities based in North America¹) (“**Amynta**” “**us**” “**we**” “**our**”) other privacy policies or notices. In the event of a conflict between any other Amynta policy, statement or notice and this Notice, this Notice will prevail as to California Consumers and their rights under the CCPA. Please also see our general privacy policy posted or referenced on our websites, apps, products, or services.

This Notice covers the collection, use, disclosure, and sale of California Consumers’ “Personal Information” (“**PI**”) as defined by the CCPA, except to the extent such PI is exempt from the notice obligations of the CCPA. This Notice covers rights California Consumers have under the CCPA, as well as the notices required by other California laws. The description of our data practices in this Notice, as required by the CCPA will be updated annually. Our data practices may change, and if our practices become materially different such that we think a Consumer would reasonably expect notice, we will provide notice in connection with the applicable collection, which may include reference to other applicable privacy policies and notices.

Consistent with the CCPA, job applicants, current and former employees and independent contractors (“**Personnel**”), and subjects of certain business-to-business communications acting solely in their capacity as representatives of another business, are not considered “Consumers” for purposes of this Notice or the rights described herein.

1. Our Personal Information Practices

We collect, use and disclose the following categories of PI for business purposes:

- Biometric Information - such as voice recordings from calling our call center
- Commercial Information - such as records of products purchased or considered
- Inferences from PI Collected - such as preferences for products
- Internet Usage Information - such as browsing information or cookies
- Non-public Education Information - such as language preference or certifications of technicians/servicers
- Personal Identifiers - such as name, address or email

¹ Builders & Tradesmen's Insurance Services, Inc. (BTIS), Warrantech

- Personal Information Records - such as account/user names, phone number or insurance/warranty identification
- Professional or Employment Information - such as name of company/agency/servicer or job title/position

We collect PI from the following sources:

We do so for the following business or commercial purposes provided for in the CCPA:

- Business Purpose – Auditing
- Business Purpose – Performing services
- Business Purpose – Quality and safety
- Business Purpose – Research and analytics
- Commercial Purpose – Interest based advertising

We may share PI with the following categories of third parties:

- Business partners (such as insurance carriers, servicers or technicians)
- Company affiliates and subsidiaries (aside from the entity who collected the data)
- Government entities
- License Boards
- Independent contractors (including agents, consultants, servicers and technicians and temp workers)
- Professional services organizations (such as auditors and law firms)
- Third party adjuster firms
- Third party technicians and service partners
- Vendors/suppliers

In addition, we may collect, use and disclose your PI as required or permitted by applicable law. As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as PI and we reserve the right to convert, or permit others to convert, your PI into deidentified data or aggregate consumer information. We have no obligation to re-identify such information or keep it longer than we need it to respond to your requests.

Notwithstanding anything to the contrary in our other privacy notices, we typically restrict use of your PI that is shared with our vendors for business purposes. Our vendors may themselves engage services providers or subcontractors to enable them to perform services for us, which sub-processing is, for purposes of certainty, an additional business purpose for which we are providing you notice.

We do not believe that we “Sell” PI. For more information on your Do Not Sell rights, see the Do Not Sell section of this Privacy Notice.

2. California Privacy Rights

We provide California Consumers the privacy rights described in this section.

If we cannot comply with a request, we will explain the reasons in our response. You are not required to create an account with us to make a verifiable Consumer Request. We will use PI provided in a verifiable Consumer Request only to verify your identity or authority to make the request and to track and document request responses, unless you also gave it to us for another purpose.

We will make commercially reasonable efforts to identify Consumer PI that we collect, process, store, disclose and otherwise use and to respond to your California Consumer privacy rights requests. We reserve the right to direct you to where you may access and copy responsive PI yourself. We will typically not charge a fee to fully respond to your requests; provided, however, that we may charge a reasonable fee, or refuse to act upon a request, if your request is excessive, repetitive, unfounded or overly burdensome. If we determine that the request warrants a fee, or that we may refuse it, we will give you notice explaining why we made that decision. You will be provided a cost estimate and the opportunity to accept such fees before we will charge you for responding to your request.

Consistent with the CCPA and our interest in the security of your PI, we will not deliver your social security number, driver’s license number or other government-issued id number, financial account number, any health or medical identification number, an account password, or security questions or answers in response to a CCPA request; however, you may be able to access some of this information yourself through your account if you have an active account with us.

Your California Consumer privacy rights are as follows:

A. Right to Know:

You have the right to send us a request, no more than twice in a twelve-month period, for any of the following for the period that is twelve months prior to the request date:

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for our collecting or selling your PI.
- The categories of third parties to whom we have shared your PI.
- The specific pieces of PI we have collected about you.

- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.

A list of the categories of PI sold about you in the prior 12 months, or that no sale occurred. You also have the right to make or obtain a transportable copy, no more than twice in a twelve-month period, of your PI that we have collected in the period that is 12 months prior to the request date and are maintaining.

To make a request, you may contact the Amynta Privacy Team at privacy@amyntagroup.com. If you are disabled and need reasonable accommodations to facilitate your request, please let us know. As permitted by the CCPA, any request you submit to us is subject to an identification and verification process. We will verify identity based on matching information you provided with data we have maintained on you in our systems. This data could include but is not limited to policy or account number, date of birth or email address. If we are not satisfied that we have sufficiently verified your identity, we may direct you to this Notice for information on our PI practices generally.

Please note that PI is retained by us for various time periods, so we may not be able to fully respond to what might be relevant going back 12 months prior to the request.

B. Do Not Sell:

We do not believe that we “Sell” Consumer PI as those terms are defined by the CCPA, however, we will apply opt-outs to marketing emails or distributions received and to any future sales of PI by us, or to activities that we later conclude that does qualify as a sale under the CCPA, such as if the State of California provides guidance that differs from our current conclusions.

For data practices related to third-party cookies and tracking devices associated with our websites, we do not think that these third party technologies and activities are considered a “Sale” of your PI by us. We may participate in third party signal programs that restrict the processing activities of cookie operators to service provider purposes, but we do not guarantee that they will do so. You can, however, exercise control over browser-based cookies by adjusting the settings on your browser, and mobile devices may offer ad and data limitation choices. In addition, third party tools enable you to search for and opt-out of some of these trackers, such as the Ghostery browser plug-in available at <https://www.ghostery.com/>. We do not represent that these third-party tools, programs or statements are complete or accurate, clearing cookies or changing settings may affect your choices and you may have to opt-out separately via each browser and other device you use.

Some browsers have signals that may be characterized as do not track signals, but we do not understand them to operate in that manner or to indicate this to be in scope as a Do Not Sell.

C. Right to Delete:

Except to the extent we have a basis for retention under CCPA, you may request that we delete your PI that we have collected directly from you and are maintaining. Our retention rights include, without limitation, to complete transactions and service you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes, including maintaining business records, to comply with law, to exercise or defend legal claims, and to cooperate with law enforcement. Note also that we are not required to delete your PI that we did not collect directly from you. To make a request, you may contact the Amynta Privacy Team at privacy@amyntagroup.com. As permitted by the CCPA, any request you submit to us is subject to an identification and verification process. We will verify identity based on matching information you provided with data we have maintained on you in our systems. This data could include but is not limited to policy or account number, date of birth or email address. You may be required to execute an attestation under penalty of perjury. If we are not satisfied that we have sufficiently verified your identity, we may deny your request or direct you to this Notice for information on our PI practices generally.

D. Non-Discrimination:

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights.

E. Authorized Agents:

Authorized agents of Consumers may make a request by contacting the Amynta Privacy Team at privacy@amyntagroup.com. As permitted by the CCPA, any request you submit to us is subject to an identification and verification process, and confirmation of the agent's authority, which may include attestation under penalty of perjury. Absent a power of attorney, we will also require the Consumer to verify their own identity. We may verify identity based on matching information you provided with data we have maintained on you in our systems. This data could include but is not limited to policy or account number, date of birth or email address.

F. Limitations on Rights:

Notwithstanding anything to the contrary, we may collect, use and disclose your PI as required or permitted by applicable law and this may override your CCPA rights. In addition, we need not honor any of your requests to the extent that doing so would infringe upon our or any other person or party's rights or conflict with applicable law.

3. Additional California Notices

We do not share personal information as defined by California Civil Code § 1798.83 (“Shine the Light law”) with third parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law by contacting us at privacy@amyntagroup.com.

Any such request must include “California Shine the Light Request” in the subject line and in the body of your message and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address.

As these rights and your CCPA rights are not the same and exist under different laws, you must exercise your rights under each law separately.

4. Contact Us

For more information on your California privacy rights contact us at privacy@amyntagroup.com.