# From the desk of **Robin Chase Insurance Agency**

# **PRIVACY POLICY**

Your information privacy is important to us.

We provide this Privacy Policy to explain how we collect, use, protect, and disclose information and data when you use our websites on which this Privacy Policy is posted, (each, "This Website"), and our mobile applications, application programming interfaces, and other services offered by Robin Chase Insurance Agency, and any other time you interact with Robin Chase Insurance Agency (collectively, the "Services"). For clarity, in the event one of our websites contains a privacy policy which varies from this Privacy Policy, the privacy policy on that website applies only to that website.

This Privacy Policy also explains your choices for managing your information preferences, including opting out of certain uses of your Personal Information (defined below).

This Privacy Policy applies to all users of this Website and the Services. This Website and the Services are provided by Robin Chase Insurance Agency. ("RCAI", "we", "our", "us").

# BY USING THIS WEBSITE OR ANY OF THE SERVICES, YOU ARE CONSENTING TO THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.

Personal Information We Collect:

We may collect the following categories and types of "Personal Information":

\* Contact information: your first and last name, alias or username, mailing address, email address, and phone number;

\* Other identifying information: internet protocol (IP) address, unique personal identifiers, online identifiers, Social Security number, driver's license number, state identification card number, insurance policy number, passport number or similar identifiers, social media user names, passwords and other security information for authentication and access, physical characteristics or description, medical information or health insurance information;

\* Financial Information: credit card number, debit card number, bank account information and other financial information;

\* Demographic information: gender, age, employment information and salary information;

\* Geolocation data;

\* Internet or other electronic activity: your browsing, search and click history, including information about how you navigate within This Website and the Services

and which elements of This Website and the Services you use the most, and ratings and reviews or other content you post on This Website or to the Services;

\* Commercial information: products or services purchased or viewed on This Website or through the Services;

\* Audio and visual information: your videos and photos, such as audiovisual content you upload to your user profile and other audio or video recordings initiated by us; and

\* Inferences drawn from the categories described above in order to create a profile about you to reflect your preferences, characteristics, behavior and attitude.

Free Text. Please note that we may collect other Personal Information that you choose to provide in a free-text entry box, either as part of your User Account/Profile or as part of any Content you contribute to This Website or in connection with the Services.

Message or Email Content. We may also collect other Personal Information in the form of message or email content when you choose to link certain third-party messaging or email services (e.g., WhatsApp or Gmail) to your User Account/Profile or when you interact with these services on This Website or in connection with the Services.

# **Sources of Collection**

We obtain the categories of Personal Information listed above from the following categories of sources:\* Directly from You. For example, from forms you complete to register for a user account or create a user profile on This Website, for an App in the Marketplace, when otherwise using the Services, or to provide feedback or suggestions about This Website or the Services. We also collect records of products or services you consider for purchase when you search for businesses on This Website or through the Services, ask questions in our Q&A section or request quotes or contacts from businesses who advertise with us.

\* Indirectly or passively from you or your computers, devices or internet browsers. For example, This Web-site use "cookies" on your browser that enable us to track your interactions with This Website, the Services and Ads, and our Apps may collect geolocation from your mobile device if you search for a business "near" your current location. This activity is further described in the Cookies and Advertising and Online Tracking sections below.

\* Indirectly or passively from you if you choose to link certain third-party email or messaging services (e.g., WhatsApp or Gmail) to your User Account/Profile or when you otherwise interact with these services on This Website or in connection with the Services.

\* From telephone carriers and providers. For instance, we collect caller ID information from incoming calls to our call tracking numbers, and we receive Consumer information for the purpose of publishing White Pages residential telephone directories in certain geographic areas.

\* From your contacts. For example, if another user chooses to use an available referral or share feature on This Website or through the Services (e.g., to send a

postcard, listing, page link, contest invitation, etc. to you), we may collect certain Personal Information about you as the recipient of the shared information

(e.g., name, address, e-mail address, mobile telephone number).

\* From Social Networking Services. For example if you use Facebook or Google to sign-in to your account on This Website or to the Services, we collect such information about you that you permit the Social Net-working Service to share with us.

\* From Service Providers that collect certain Personal Information from or about you on our behalf, such an analytics software or platform that we use to measure and analyze traffic to This Website, the Services or interaction with our Ads.

Purpose of Collection and How We Use Personal Information

We use your Personal Information for the following categories of use:

Transactional Purposes: We use your contact information, financial information, and commercial information to:

\* Fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a quote from a business, we will use that Personal Information to facilitate communication between you and the business regarding the quote;

- \* Create and update your User Account/Profile;
- \* Receive, process, or confirm your request, order, inquiry or registration;
- \* Communicate with you about your request, order, inquiry or registration;

\* To create, maintain and secure your User Account/Profile on This Website or in connection with the Services; and

\* To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Consumer Personal Information held by us is among the assets transferred. Analytical Purposes: We use your other identifying information, internet activity and browsing history, commercial information, demographic information, and geolocation data to analyze preferences, trends and statistics.

Marketing and Promotional Purposes: We use your contact information, commercial information, demo-graphic information, internet or other electronic activity, geolocation data, and inferences to:

- \* Inform you of our new products, services and offers;
- \* Provide you with targeted advertising;
- \* Run contests, promotions and sweepstakes;
- \* Provide you with other information from and about Robin Chase Insurance Agency, including personalized marketing communications;

\* Help us measure and understand site metrics, such as website traffic and its sources and conversions in order to gauge the effectiveness of online advertising;

\* Personalize your experience and to deliver you content and offers relevant to your interests, including targeted offers and ads through This Website, on third-party sites, and via email, text message (with your prior express consent, where required by law), in-app push notifications, or other similar means; and

\* Provide you with communications or notices regarding Website and Services operations, our products or services, or happenings that may be of interest to you.

Maintenance and Improvement of This Website and the Services: We use your contact information, commercial information, audiovisual information, and internet activity and browsing history to:

\* Provide you with This Website and the Services, including to send you alerts about your account;

\* Handle your customer services requests;

\* Help us diagnose technical and service problems and administer This Website and the Services;

\* Help us to monitor and improve this Website's and the Services' performance and to make it easier for you and other users to use and manage features and programs made available through this Website and the Services;

\* Help us to better understand the functionality of our mobile applications on your phone;

\* To provide support, personalize and develop this Website or the Services;

\* For A/B and other feature testing, research, analysis, evaluation and product development, including to develop and improve this Website and the Services;

\* To provide you with support and to respond to your feedback, suggestions, and inquiries, including to investigate complaints and address your concerns about content that violates our policies, or to improve content quality and accuracy, as well as to monitor and improve our responses.

Review and content creation purposes: We use your contact information, commercial information, and audio and visual information to enable reviews of our products and to display content that you have created and allowed us to display on this Website and the Services and on social media.

Security and Fraud Prevention: We use your contact information, other identifying information, commercial information, financial information, geolocation data, audiovisual information, internet activity and brows-ing history, and inferences to: \* Protect this Website, the Services, databases and other technology assets;

\* Protect RCIA and our business;

- \* Minimize or prevent fraudulent or bot traffic;
- \* Detect and prevent malicious, deceptive, fraudulent or illegal activity on this Website or the Services;
- \* Protect the rights, security, and safety of Robin Chase Insurance Agency personnel and users of this Website and the Services; and

\* Respond to law enforcement requests and as required by applicable law, court order, or governmental regulations, or in order to comply with applicable laws, rules and regulations, such as the Digital Millennium Copyright Act (DMCA).

We may collect additional Personal Information for a purpose and use not listed here when, for example, you sign up for a specific Robin Chase Insurance Agency Solution. If necessary, we will provide details of our collection and use of associated data during the sign up process. Robin Chase Insurance Agency 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 notice.

Restricted Scope Data: Notwithstanding any other provision of this Privacy Policy, our use of information received from Google APIs, including Gmail, ("Restricted Scope Data") will adhere to the Google API Services User Data Policy, including the Limited Use requirements. That is, we only use Restricted Scope Data to provide or improve your experience or use of Gmail though this Website or the Services. We do not use Restricted Scope Data to serve you advertisements or for any other purpose not listed here. Moreover, unless required for security purposes or to comply with applicable laws, no humans will have the availability to read Restricted Scope Data.

Personal Information , controlled by, or under common control of Robin Chase Insurance Agency will not be shared by either Robin Chase Insurance Agency for any other reason than to provide the services you are seeking.

#### **Third Parties**

We may share Personal Information with a third party if you specifically authorize it, or it is required in order to complete a transaction, service or activity that you initiated or requested.

#### **Corporate Transactions**

If Robin Chase Insurance Agency is merged, acquired, or sold, or in the event of a transfer of some or all of our assets, we may disclose or transfer Personal Information in connection with such transaction. You will have the opportunity to opt out of any such transfer if, in our discretion, it will result in the handling of your Personal Information in a way that differs materially from this Privacy Policy.

# **Compliance with Laws and Law Enforcement**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose Personal Information and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to legal requests (including court orders and subpoenas), to protect the safety, property, or rights of Robin Chase Insurance Agency or of any third party, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

Restricted Scope Data: As stated above, notwithstanding any other provision of this Privacy Policy, our transfer or disclosure of Restricted Scope Data will adhere to the Google API Services User Data Policy, including the Limited Use requirements. That is, we only share or transfer Restricted Scope Data for the following purposes: (1) as necessary to provide or improve your experience or use of Gmail through This Website or the Services; (2) to comply with applicable laws; or (3) as part of a merger, acquisition, or sale of assets by us. We do not transfer Restricted Scope Data to serve you advertisements or for any other purpose not listed here.

#### Cookies

We use cookies (a small text file placed on your computer to identify your computer and web browser) and may use anonymous identifiers (a random string of characters that is used for the same purposes as a cookie). We use cookies and other similar technologies to analyze use of and improve This Website and the Services and as described in the Advertising and Online Tracking Section of this Privacy Policy. Most web browsers are initially set up to accept cookies. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent, however, certain features of This Website or the Services may not work if you delete or disable cookies. Some of our Service Providers may use their own cookies, anonymous identifiers, or other tracking technology in connection with the services they perform on our behalf.

We use third-party data analytics tools to analyze how users use the App and Services. For more information about how to opt out of having your information used by Google Analytics, visit https://tools.google.com/dlpage/gaoptout/.

#### Advertising and Online Tracking

We may place advertisements and allow third-party companies to serve ads and collect certain information when you visit this Website or use the Services. These companies may use certain information (e.g. click stream information, web browser type, time and date, subject of advertisements clicked or scrolled over) during your visits to this Website and other websites in order to provide advertisements about goods and services likely to be of interest to you. These companies typically use a cookie to collect this information. Our systems do not recognize browser "Do Not Track" signals, but several of our Service Providers who utilize these cookies on this Website enable you to opt out of targeted advertising practices. To learn more about these advertising practices or to opt out of this type of advertising, you can visit www.networkadvertising.org or www.aboutads.info/choices/. We also provide you with additional tools to opt out of marketing from us. You can learn about this in the "Managing Your Information Preferences" section of this Privacy Policy.

#### **Managing Your Information Preferences**

You can opt out of receiving marketing e-mails from us by following the Unsubscribe link provided at the bottom of all marketing e-mails you receive from us. You are able to opt out of receiving marketing e-mails from us, however, you cannot opt out of receiving all e-mails from us, such as e-mails about the status of your account.

#### Be Careful When You Share Information with Others

Please be aware that whenever you share information on any public area of this Website or the Services, that information may be accessed by others. In addition, please remember that when you share information in any other communications with third parties, that information may be passed along or made public by others. This means that anyone with access to such information can potentially use it for any purpose, including sending unsolicited communications.

#### Security

We maintain physical, electronic, and procedural safeguards to protect the confidentiality and security of information transmitted to us. It is also important for you to protect against unauthorized access of any account password or your computer. However, no data transmission over the Internet or other network can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted on or through this Website or the Services, we cannot and do not guarantee the security of any information you transmit on or through this Website or the Services, and you do so at your own risk.

#### Links

This Website and the Services may contain links to other websites or allow others to send you such links. A link to a third party's website does not mean that we endorse it or that we are affiliated with it. We do not exercise control over third-party websites. You access such third-party websites or content at your own risk. You should always read the privacy policy of a third-party website before providing any information to the website.

#### **Children's Privacy**

This Website and the Services are intended for and directed to a general adult audience. We do not knowing-ly collect Personal Information from children under the age of 13. If we become aware that we have inadver-tently received Personal Information from a child, we will delete such information from our records.

#### **Processing Location**

Please be aware that your Personal Information and communications may be transferred to and maintained on servers or databases located outside your state, province, or country. Please be advised that we store all information in the United States. Additionally, we may process information in multiple locations, including without limitation, the United States, Australia, Canada, India, Israel, Italy, Mexico, the Netherlands, Poland, and the Philippines. The laws in these countries may not be as protective of your privacy as those in your location. By using This Website or Services, you are agreeing to the collection, use, transfer, and disclosure of your Personal Information and communications will be governed by the applicable laws in the United States and/or the applicable country of processing.

Notice to California Residents/Your California Privacy Rights

If you are a California resident, you may have certain privacy rights under the California Consumer Privacy Act ("CCPA Rights"). This section describes those rights and how you can exercise them with Robin Chase Insurance Agency.

## **Right to Know**

You can request what Personal Information we have collected about you in the preceding 12 months.

You can request the specific pieces of Personal Information we have collected about you.

You can also request the following categories of information:

The categories of Personal Information we have collected about you.

The categories of sources from which the Personal Information was collected.

The business or commercial purpose for collecting or selling the Personal Information.

The categories of third parties with whom we shared Personal Information.

## **Right to Deletion**

You can also request that we delete your Personal Information. We may not delete all of your Personal Information if one of the following exceptions applies:

Transactional: to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or perform a contract we have with you;

Security: to detect and prevent data security incidents;

Error Correction: to debug or repair any errors;

Legal: to protect against fraud or illegal activity or to comply with applicable law or a legal obligation, or exercise rights under the law, such as the right to free speech; or

Internal Use: to use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information (i.e. to improve our services).

We will also maintain a record of your CCPA Rights requests.

Please note that if we delete your Personal Information, some of our services will not work the same. For example, your previous opt out requests will not be saved and saved preferences and information will no longer be available.

# **Exercising your Rights:**

To exercise your right to know or delete your Personal Information, submit a verifiable consumer request to us by either:

\* Calling us at 1-616-374-1680.

\* Visiting https://www.robinchaseinsurance.com/contact to fill out and submit our web form to request to access or delete your Personal Data.

Your verifiable consumer request must:

\* Provide sufficient identifying information (including full name, postal address, and email address) to allow us to reasonably verify you are the person about whom we collected and retained Personal Information, and/or your authority to make such request on behalf of the data subject, and

\* Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Note that we will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request or to review and comply with the request.

You may authorize someone to act as your agent and submit a request on your behalf. Due to the sensitivity of such requests, you must verify the agent's authorization before we will act. Accordingly:

\* You or your agent must supply written permission for a specific agent to act on your behalf; and

\* We will use your email address to connect directly with you to verify agent identity and authority.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm with a level of confidence appropriate to the sensitivity of the information that the Personal Information we have collected and retained in our systems and databases relates to you.

Making a verifiable consumer request does not require you to create an account with us, but if you have an account with us, we may require you to log-in to such account in order to verify your identity or authority or to provide or delete your information.

Non-Discrimination; Financial Incentives

We will not discriminate against you for exercising any of your CCPA Rights and we will not deny you goods or services, charge you a different price, or provide you with a lesser quality of goods or services if you exercise any of your CCPA Rights.

However, we may offer various financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Person-al Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

#### **Privacy Policy Changes**

We may change this Privacy Policy from time to time. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on this Website. Those changes will go into effect on the effective date shown on the revised Privacy Policy. By continuing to use this Website or the Services, you are consenting to the revised Privacy Policy.

Contact Us: 616-374-1680, robin@robinchaseinsurance.com.