

# **Independence Pet Insurance Privacy Policy**

Online Information Practices and Cookie Notice

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## **Overview**

Independence Pet Insurance Company, (a Delaware licensed insurance company, and a subsidiary of Independence Pet Holdings, a Delaware corporation; hereafter referred to as “IPIIC”, and together with its affiliates, collectively referred to as “Company,” “we,” “us” or “our”). We respect your privacy and are committed to protecting your privacy, and the confidentiality and accuracy of your Personal Information.

This Privacy Policy explains how Personal Information will be collected, used, or disclosed. Your rights, obligations, and options regarding your Personal Information (defined below) are outlined herein. Throughout this policy, this website and all other affiliated websites will be referred to as the “Website” or “Websites”. Services provided by or enabled via the Websites will be referred to as the “Products” or “Services”. The term “Customer” also refers to anyone who might visit our Website(s) or purchase our Products and may be referred to collectively in this document as “you”, “your” or “yours”.

Through continued use of our Website and/or by completing a transaction with us, you authorize and consent to the processing of personal information as described in this Privacy Policy. This policy may change from time to time, and your continued use of our websites and services is deemed to be acceptable of such changes, so please check the policy periodically for updates. We are not responsible for the content or privacy practices of third-party sites to which this Website, or any other Website, may link.

## **What Personal Information Do We Collect?**

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

The information we may collect may include but is not limited to:

- First and Last name
- Address
- Email Address
- Telephone Number
- Unique numerical identifiers such as an IP address or mobile device identifier
- Geolocation or precise geolocation based on product capability
- Financial Information
- Information related to products and services purchased, data concerning website traffic and visits to the extent that such data is connected to a person’s personal information.
- Information regarding your dealings with us, including policy information, claims history, and premiums
- Audio, electronic visual, or other similar records

Personal Information does not include information anonymized through the removal of identifying details in a way that ensures the data can no longer be connected to an individual.

### **Your Personal Information and Insurance Products**

If you purchase an insurance product from us, your Personal Information will be used to administer your insurance policy, and federal law requires that we disclose how your information is used, pursuant to the requirements outlined in the Gramm-Leach-Bliley Act (GLBA). A copy of this disclosure will be provided to you at the time of purchase.

### **Your Consent**

Your consent may be obtained in various ways. We may obtain your express consent, or we may determine that consent has been implied by the circumstances. Express consent could be in writing, web forms, or verbally in person or over the phone. When we receive Personal Information from you through our Website, by phone or by mail that enables us to provide you with a requested Product or Service, you consent to allow us to deal with that Personal Information in a reasonable manner. Except in cases where consent is not legally required, we identify the reasons for the collection of your Personal Information.

It is important that you understand and consent to our collection, use, and disclosure of your Personal Information. We rely on the following actions by you as indications of your consent to our existing and future use of your Personal Information for identified purposes, until you notify us of a withdrawal of your consent:

- Your voluntary provision of Personal Information directly to us and our affiliates through our Website(s) in relation to one or more of our Services.
- Your consent is given through your authorized representative such as a legal guardian, agent, or holder of power of attorney.

By providing Personal Information about a third party such as a family member, emergency contact, or secondary owner by any of the above methods, you represent that you have obtained their consent to the collection, use, and disclosure of such Personal Information in accordance with this Privacy Policy.

In the event you request changes, endorsements, renewals or other Products and Services, the original consent provided directly to us, or indirectly through a third party, will remain in effect. If our terms and conditions change, we will notify you at the time of change.

### **Why We Collect and Use Personal Information**

Collecting Personal Information about you is essential to provide you with the Products and Services that best meet the needs of you and your pet. Your decision to withhold information may limit or affect the quality of service that we can provide to you. We collect, use, and disclose Personal Information (including to and from our affiliates and/or subsidiaries and/or third-party service providers / suppliers) for the following purposes:

- Offering and providing insurance quotes, policies, and related products and services to you.

- Administering and processing both insurance products and services, or their renewal.
- Ensuring policy holders obtain the appropriate services, discounts, and benefits in accordance with applicable terms.
- Establishing and maintaining communications with you.
- Verifying your identity and the accuracy of your personal information through, for example, the exchange of information with government agencies, industry associations, brokers, and other insurers.
- Analyzing, assessing, underwriting, and reinsuring insurance risks on a prudent basis.
- Determining and facilitating your payment of fees and insurance premiums.
- Investigating and settling insurance claims.
- Detecting and preventing fraud or other illegal activities.
- Compiling statistics and reporting to regulatory or industry entities in accordance with prudent insurance practices.
- Joint Marketing purposes.
- Gathering your feedback to help us improve our products and services.
- For the purposes of studies, aggregated analysis and audience grouping for marketing measurement and optimization, and identifying statistics, including to establish rates; to understand and analyze the interests, needs, and preferences of policyholders, prospective customers, and website visitors; to perform internal audits or verification; and to carry out products and services improvement activities.
- To develop, design, improve, market, or recommend products and services to respond to the needs and interests of current and prospective members and policyholders. We may also continue to market to you if you are no longer a customer.
- To communicate with you, respond to questions or complaints, requests for advice or other inquiries.
- Complying with the law or the requests of law enforcement agencies or regulators.
- For internal, external, and regulatory audit purposes.
- For the purposes of investigation and law enforcement.
- To send you marketing communications, and any offers on products or services that might be of interest to you.
- To recognize you and identify your preferences on our website, social media, email platforms, and mobile applications (as applicable), and to analyze their use, improve, and personalize their content.
- To communicate with you regarding any changes to our programs and their operations.

In this Privacy Policy, the above list of identified purposes will be referred to as “Identified Purposes.” We will not process or disclose your Personal Information to any third party, for any other purpose except as identified or permitted by law. If your Personal Information is used or disclosed for any purposes not related to the Identified Purposes, we will first obtain your consent for such purpose, except where prohibited by law.

## **How We Collect Personal Information**

We may collect personal information from customers in several ways, including verbal, written, and electronic forms, through the Web, by telephone, mail, email, SMS (based on your consent, availability, and applicable terms), and chat (as available), through our authorized third-party service providers, affiliates, or otherwise, including but limited to, when you:

- Request or obtain a quote for pet insurance.
- Complete a transaction with us, our affiliate, or our business partners.
- Participating in our contests, promotional offers or receive discounts and benefits.
- Sign up or accept to receive newsletters, promotional and marketing emails, or other communications from us concerning our products, services, promotions, or events.
- Visit our website or social media platforms or interact with emails or online advertising. For more information, please review the Cookies and Digital Marketing section of this document.
- Contact, interact or communicate with one of our representatives to submit a request for service, remark, question, or complaint. In this regard, because some of our services are provided by telephone, the calls may be recorded to ensure the quality of our services and to protect both parties in the event of a disagreement.
- Participate in a survey or customer research by us.

When we receive personal information from you through our Website(s), by phone or by mail that enables us to provide you with a requested Product or Service, or to respond to a specific question, request, or complaint, you consent to allow us to deal with that personal information in a reasonable manner.

## **Pet Medical Information and Demographic Information**

We obtain or share your pet's medical and/or demographic information only in connection with specific products and services. This may include underwriting a pet insurance policy, processing a claim or any other use that we disclose to you before the information is collected. We have implemented measures designed to secure your pet's medical information from accidental loss and from unauthorized access, use, alteration, and disclosure.

## **How Long Do We Keep Your Data**

We will only collect, use, or disclose personal information that is necessary to provide products and services. We will retain your personal information only as long as necessary to satisfy our legal or business obligations, including for the purposes of satisfying any legal, tax, accounting or reporting requirements.

Some of the factors considered when determining the appropriate retention period for personal information include the amount, nature, and sensitivity of the personal information processed, the potential risk of harm from any unauthorized use or disclosure of your personal information, the

purposes for which we process your information, and applicable legal and contractual requirements.

As explained in the “[How May I Make A Request](#)” section, you can request the deletion of your personal information. Once the purposes for processing the information have been fulfilled and personal information is no longer required, we will delete it. In some circumstances, we may permanently anonymize your personal information so that it can no longer be used to identify you in any way, in which case we may use the anonymized data without further notice to you.

## **How We Share Personal Information**

To manage our products and services, we may share your information as allowed or required by law. We may share your information with our affiliates or third parties outside of the Company to service, market or underwrite our products and services to you. We rely on contractual agreements with affiliates, service providers, and third-party insurance agents and brokers which sell our products and services. Contractual agreements include requirements for the protection and limitation of usage of your information.

We may disclose personal Information that you provide via this website or mobile application to the following third parties:

- Our subsidiaries and affiliates.
- Contractors and service providers we use to support our business,
- Joint Marketing Agreements with non-affiliated third parties to jointly market insurance products and services.
- Veterinarians to assist with processing your claims.
- In the event of merger, acquisition, or any form of sale of some or all of our assets, in which case personal information held by us about our customers will be among the assets transferred to the buyer.
- We may also disclose your personal information to third parties to:
  - Comply with any court order or other legal obligation.
  - Enforce or apply our Terms of Use.
  - Protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **Independent Agents and Brokers**

The independent insurance agents and brokers who sell our products and services are not our employees and are not subject to our privacy policy. Contact your agent or broker to learn more about their privacy practices.

## **Links to Other Websites**

Our website contains links to other websites for informational or resource purposes. These other websites are not under our direct control, and they may collect information about you that we do not. We are not responsible for the privacy practices or the content of linked websites. We encourage you to reference the privacy policies of third-party websites and / or mobile applications before providing any personal information to them.

## **Marketing and Other Communications**

**Social media:** As an extension of our internet presence, we have social media accounts on Facebook, Instagram, LinkedIn, and TikTok, or others. The social media accounts of businesses are public, and therefore we recommend anyone who chooses to interact via social media should first read the terms of use and confidentiality and privacy policies of those platforms to inform themselves of how personal information is used by those platforms. Since all content posted on our social media accounts can be viewed publicly, we recommend users exercise caution when providing or disclosing personal information or details about themselves.

We offer content or discussions on our social media accounts, which, depending on your account settings, may allow us to access certain personal information associated with your social media account(s). We do not receive direct access to users' private social media account information. Any data shared with us is governed by the privacy settings and policies of the social media platform. We may also collect the date and time you visited the page for the purpose of sharing. We may use this information to confirm your identity and personalize your experience. We may also use the services provided by social media platforms to display targeted advertisements intended for the users of such platforms.

**Email and advertising targeting:** We strive to manage all email addresses responsibly and in compliance with applicable laws. Therefore, pursuant to express consent you have given us, or implied based on the circumstances, we may send you promotional messages by email, unless you unsubscribe from such emails.

To better understand and improve the effectiveness of our email marketing efforts, when we send you an email for marketing purposes, we collect information to assess the open rate and to know whether you clicked on the links in the email, and which of our websites you visited.

You may remove your name from our mailing list at any time by following the unsubscribe link displayed at the bottom of every advertising email from us. We will remove your name from our electronic mailing lists within 10 business days of your request. Note that unsubscribing from our commercial messages, certain specific situations such as invoicing or information about your policy or membership allow us to send you emails in accordance with the exceptions provided by law.

**Text Communications:** We may utilize text messaging, or SMS, communications and we strive to ensure compliance with all applicable laws for responsible SMS communication. Therefore, to receive SMS updates and promotions, we will ask for your express written consent before communicating with you. Message and data rates imposed by your mobile provider may apply. Text message opt-in originator will not be shared with affiliates or third parties for marketing purposes without your consent.

If you choose to opt-out of receiving promotional SMS communications, you may do so at any time by simply responding “STOP” to our messages or by clicking the unsubscribe link in the message. However, we may continue to periodically communicate with you via SMS for non-promotional matters. To opt-out of these messages, you can update your communication preferences in your profile.

## **Cookies and Digital Marketing**

Our Websites may use certain automated tools including cookies, browser analysis tools, server logs, and web beacons to offer you a more customized browsing experience, to better recognize your needs, to follow trends, to target marketing initiatives and to offer you content that is more relevant to you. Third-party services may also be utilized to gather and analyze data about the areas visited on the websites (such as the page most frequented, time spent, search terms used and other engagement information) to further enhance the user experience.

**Cookies:** Our Websites utilize cookies. A cookie is a small file stored on your computer or other browser-enabled device. We use cookies to enhance our Websites, personalize the user experience, improve search speed, and identify when users revisit our Website. These cookies do not read data from your device or other websites’ cookies. You have the option to refuse cookies by selecting the appropriate setting within your browser. However, if you choose to select this setting, it may impact your ability to access certain parts of our Websites.

**Targeted data made available by digital marketing service providers:** We could also utilize services provided by third-party platforms e.g., Search and social media to present targeted advertisements, based on the user data collected by such platforms. In general, the way you engage with and receive advertisements on those platforms is governed by each platform's respective privacy policy, terms of use, and preference options. We may also sometimes use the third-party platforms to offer users more targeted advertising, based on multiple factors such as the platform's user data and interactions with us outside of the platform, as applicable.

**Web Beacons:** Website pages may contain electronic images known as web beacons or single-pixel gifs which allow us to count visiting users as well as record.

**Usage Details and IP Addresses:** While you navigate around our Website, we may also collect information about your visit, including, but not limited to: traffic and location data and logs, other communication data resources that you access, as well as information about your device and internet connection, including your IP address, operating system and browser type, for system administration and to report aggregate data to our advertisers. This is considered statistical data and does not identify any individual.

You may opt out of tracking cookies or control how information collected by cookies is used through your browser or using the cookie widget on the Website(s), or the "Do Not Sell or Share My Personal Information" link on the Website(s).

**Global Privacy Control:** Our Website is enabled to receive and apply privacy preferences through Global Privacy Control. To learn more about Global Privacy Control, visit <https://globalprivacycontrol.org>.

**Third-Party Advertiser Use of Cookies and Web Beacons:** Some advertisements are served by third-party advertising companies. Please note that our advertisers may also use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about our users. We do not have control over third-party advertisers' cookies or how they may be used. If you have any questions about an advertisement, you should contact the advertiser responsible directly.

We do not collect personally identifiable information automatically, but we may tie any information collected through cookies to information you may have previously submitted.

## **Web Analytics**

We may use analytical tools by Google, Inc. (Google Analytics, Google Tag Manager, Google Search Console) or others to evaluate data and to analyze the browser behavior of visitors to its sites as well as to understand the allocation and the result of traffic sources. We do not collect personally identifiable information automatically, but we may tie any information collected through cookies to information you may have previously submitted. Google Analytics provides tools to opt out of their services. To opt out of Google Analytics Cookies, visit <https://myadcenter.google.com/home> and [Google Analytics Opt-out Browser Add-on Download Page](#).

This site protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

When your computer or device requests page access on one of our websites, the data gathered for web analytics may include, but may not be limited to Google Advertising ID (GAID) and/or Apple Identifier for Advertisers (IDFA) for mobile users, date and time accessed, anonymized IP address (not including any visitor identifying details), browser and operating system, and pages visited and any documents downloaded.

For additional information and resources related to analytical tools and the use of data, please refer to Google's website directly.

## **How Do We Protect Your Data**

We have implemented physical, technical, and administrative security measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

Where we have given you (or where you have chosen) a password for access to certain parts of our website or mobile application, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Please note that the information you share in public areas of the website or mobile application, such as comments, may be viewed by any user of the website or mobile application.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your

personal information transmitted to our website or mobile application. Any transmission of personal information is at your own risk.

## **International Transfer**

Our Company is based in the United States and the information we and our Service Providers collect is governed by U.S. law. If you are accessing the Service from outside the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Policy.

## **Browsers & Security**

In most instances, we use Secure Socket Layer (SSL) encryption technology. SSL protects information as it crosses the Internet. You can tell if you are visiting a secure area by looking at the padlock symbol at the bottom of your browser screen. If it is “locked,” you have a secure session.

## **Accuracy of Your Information**

If you need to update your information, you may do so by contacting customer service or within your online account. You are responsible for providing accurate and complete information. If you need to update your information, or if the information we have about you is inaccurate or incomplete, please contact us at:

Email: [carrieroperations@independenceamerican.com](mailto:carrieroperations@independenceamerican.com)

Telephone: [855-281-1108](tel:855-281-1108)

Mail:

Attn: Privacy Officer  
Independence Pet Insurance Co.  
11333 North Scottsdale Road, Suite 160  
Scottsdale, AZ 85254

Include your name, address, telephone number and policy number we have on file.

You can also request a copy of the information that we have about you in our files to make sure it is correct. You must make your request in writing and send it to the email address or physical address above. Within 30 business days of receiving your request, we will send you the information. If required by federal or state statute or regulation, we will advise you of any person or group to whom we have given information about you.

## **Opting Out of Marketing**

We may communicate promotions and special offers to you from time to time via email. You may choose to opt-out using the link provided in the email, updating your preferences in the account profile, or contacting customer service using the information provided below. Even if you opt out of marketing, we may still send you important non-marketing messages related to your coverage, the services you requested, or purchases. If you would like to opt out of receiving promotional and special offer emails, you can notify us:

Email: [carrieroperations@independenceamerican.com](mailto:carrieroperations@independenceamerican.com)

Telephone: [855-281-1108](tel:855-281-1108)

Please allow sufficient time for your request to be processed. It may take up to 10 days to process an email opt-out request, and 4-6 weeks for other requests.

## **User Contributions**

You are responsible for any content, including personal information, that you contribute to be published or displayed (hereinafter, “posted”) on the website or mobile application, or transmit to other users of the website or mobile application (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to other users of the website and mobile application at your own risk. Although we may limit access to certain pages, and you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the websites or mobile application with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. We are not responsible for the circumvention of any privacy settings or security measures contained on the website and mobile application. You understand and acknowledge that, even after removal, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other users. Proper access and use of information provided on the website and mobile application, including User Contributions, is governed by our Terms of Use, and known or suspected violations should be reported to:

Email: [carrieroperations@independenceamerican.com](mailto:carrieroperations@independenceamerican.com)

Telephone: [855-281-1108](tel:855-281-1108)

## **Protecting Children**

Our website and mobile application are not directed toward children under the age of 16. We do not knowingly collect or use personal information from children under 16. If you are a parent or legal guardian and have reason to believe that any of your children has provided us with personal information without your consent, please contact us and we will take steps to delete the information.

## **California Notice at Collection**

This California Notice at Collection explains how Independence Pet Insurance Company, (a Delaware licensed insurance company, and a subsidiary of Independence Pet Holdings, a Delaware corporation; hereafter referred to as “IPIIC”, and together with its affiliates, collectively referred to as “Company,” “we,” “us” or “our”) collects, uses, retains, and discloses personal information **relating only to California residents** who are subject to the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

California consumers may be entitled to certain notices and disclosures regarding the collection, use, and sharing of their personal information, rights to access, correction, and deletion of certain personal information we collect about them, restricts us from “selling” or “sharing” certain personal information, and limit our use of sensitive personal information as applicable and defined by the law and described in the categories below. These rights apply to all residents of California, regardless of whether you are a customer, website visitor, business contact, or an employee. As a California resident, you have a right not to receive discriminatory treatment for exercising your privacy rights. None of the CCPA’s rights are absolute and are subject to legal and regulatory exceptions and exemptions. For more information about the CCPA, please see:

<https://oag.ca.gov/privacy/ccpa>.

## **What is Personal Information?**

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked with a particular consumer or household. We collect Personal Information relating to California users in a variety of contexts. The specific Personal Information that we collect, use, disclose, sell or share depends on our relationship or interaction with that individual.

## **Categories of Third Parties to Whom We Disclose Personal Information**

- Our subsidiaries and affiliates for the purposes of management, analysis, or other business purposes.
- We use Service Providers and Contractors to support our business, for example, legal service, marketing or other creative or promotional agencies, information technology services and products, cloud-based services, web hosting, Service Providers or Contractors.
- Third-Party Data Analytics Providers.
- Advertising Networks for cross-context advertising purposes
- Internet service providers
- Regulatory bodies, as required by law, comply with legal obligation or to protect our rights and interests.

## **Sale, Sharing, and Other Disclosures of Personal Information**

Any category of personal information listed in the chart below may be shared for a business purpose with service providers and contractors, which are companies that we engage to conduct activities on our behalf. Service providers and contractors are restricted from using personal information for any purpose not related to our engagement.

California law requires us to provide you with information regarding the parties to whom we “sell” or “share” your information, and the parties to whom we disclose your information for a business purpose. A business “sells” personal information when it discloses Personal Information to another business or a third party for monetary or other valuable considerations.

Under CCPA, allowing certain third parties to collect Personal Information via automated technologies on our website for cross-context advertising purposes is considered the “sharing” of your Personal Information. We do not have actual knowledge that we sell or share the Personal Information of minors under 16 years of age.

Our Company sells or shares the categories of personal information listed in the chart below for advertising and analytics with social media platforms, advertising networks, and Third-Party data analytics providers.

If you would like to opt out of the share or sale of your information for advertising and analytics purposes, you can manage your preferences through the cookie widget or the “Do Not Sell or Share My Personal Information” link on our website.

We process opt-out preference signals, such as the Global Privacy Control, as required by the CCPA. These signals set the opt-out of sale and sharing preferences for the particular browser or device you are using. For information about how to use Global Privacy Control, please visit <https://globalprivacycontrol.org/>.

We may also disclose aggregated, anonymous information to any other company. This information is not linked to personal information that can identify you. In addition to the business purpose identified above, we may use (and may have used during the 12-month period to the last updated date in connection with a corporate transaction and due diligence activities for a potential or actual transaction between our business and another business, such as a proposed or actual merger, acquisition or divestiture. We may be required to disclose your personal information and non-personal information pursuant to a government subpoena, warrants, or orders.

The following charts detail our practices regarding the collection, use, and retention of your Personal Information within the 12 months preceding the date this notice was last updated. We may collect personal information and sensitive information listed in the categories. The tables also list, for each category, our expected retention period, use purposes, and whether we sell the information or share it with third parties for cross-context behavioral advertising.

<b>Personal Information Category</b>	<b>Retention Period</b>	<b>Business Purpose</b>	<b>Sold or Shared for Cross-Context Behavioral Advertising</b>
Personal Identifiers: Name, email address, phone number, contact address, username and basic account information, unique identifiers, IP Address (such as those assigned in cookies).	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Processing and fulfilling orders</li> <li>• Affiliates to offer products and services you request based on your consent</li> <li>• Maintaining and servicing accounts.</li> <li>• Advertising networks</li> <li>• Third Party Data Analytics</li> <li>• Fraud Detection and Prevention</li> <li>• Research and development</li> <li>• Compliance and legal obligations</li> </ul>	Sold and Shared
Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)): Name, email address, address, telephone number.	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Delivery of products</li> <li>• Marketing and Advertising</li> <li>• Perform Data Analytics</li> <li>• Payment processing</li> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	Sold but not Shared
Personal Information categories listed in the California Customer Records statutes (Cal. Civ. Code 1798.80(e)): Driver's license number, insurance policy number, bank account number,	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Delivery of products</li> <li>• Marketing and Advertising</li> <li>• Perform Data Analytics</li> <li>• Payment processing</li> </ul>	Not Sold or Shared

credit card number, debit card number, or any other financial information.	legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	
Protected classification characteristics under California or federal law: Sex to include Gender or Gender Identity, or military status.	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Delivery of products</li> <li>• Compliance and legal obligations</li> </ul>	Not Sold or Shared
Commercial Information: Includes records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Not Collected.	Not Collected	Not Collected
Biometric Information	Not Collected	Not Collected	Not Collected
Internet or other electronic activity information, including but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement, including unique identifiers, cookie or tracking pixel information, device ID,	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Affiliates to offer products and services you request based on your consent.</li> <li>• Marketing and Advertising</li> <li>• Perform data analytics</li> <li>• Fraud detection and prevention</li> <li>• Compliance and legal obligations</li> </ul>	Sold and Shared

search history, or interaction with an advertisement.			
Geolocation data	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Marketing and Advertising</li> <li>• Compliance and legal obligations</li> </ul>	Sold or Shared
Professional or employment related	Not Collected	Not Collected	Not Sold or Shared
Education information	Not Collected	Not Collected	Not Sold or Shared
Audio, electronic, visual, thermal, olfactory, or similar information	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	Not sold or shared.
Inferences drawn from other Personal Information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions,	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Marketing and Advertising</li> <li>• Perform data analytics</li> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	Sold or Shared

behavior, attitudes, intelligence, abilities, and aptitudes.	records retention policies, or as otherwise permitted by law.		
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Sensitive personal information is a subtype of personal information consisting of specific information categories. We may collect and use information that falls within the sensitive personal information categories below. For more information about the use of such information, please see the defined Business Purpose for every category.

<b>Sensitive Personal Information Category</b>	<b>Retention Period</b>	<b>Business Purpose</b>	<b>Sold or Shared for Cross-Context Behavioral Advertising</b>
Government identifiers, such as your Social Security number, driver's license, state identification card, passport and visa information, or immigration status and documentation.	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	Not shared or sold
Complete account access credentials, such as user names, account numbers, or card numbers combined with required access/security code or password.	Not Collected	Not Collected	Not Shared or Sold
Precise geolocation	Not Collected	Not Collected	Not sold or shared
Racial or ethnic origin.	Not collected	Not Collected	Not sold or shared
Citizenship or immigration information.	Not collected	Not Collected	Not sold or shared
Religious or philosophical beliefs.	Not Collected	Not Collected	Not sold or shared
Union membership.	Not Collected	Not Collected	Not shared or sold

Mail, email, or text messages contents not directed to the Company.	Not collected	Not Collected	Not sold or shared
Genetic data.	Not Collected	Not Collected	Not shared or sold
Neural data, which is information generated by measuring a consumer's central or peripheral nervous system activity that is not inferred from nonneural information.	Not Collected	Not Collected	Not shared or sold
Unique identifying biometric information.	Not Collected	Not Collected	Not shared or sold
Health information, including job restrictions and workplace illness and injury information.	Not Collected	Not Collected	Not shared or sold
Sex life or sexual orientation information.	Not collected	Not Collected	Not sold or shared

**Your Privacy Rights**

- **Right to Know.** You can request that we disclose to you: (i) the categories and/or specific pieces of Personal Information we have collected about you, (ii) the categories of sources for that Personal information, (iii) the purposes for which we will use that information, (iv) the categories of any third parties with whom we may disclose that information, and (v) the categories of information that we may disclose to any third parties. We will provide you with this information for the 12-month period preceding your request. You can make a request to know twice a year.
- **Right to Deletion.** You can request that we delete your Personal Information and ask our service providers to do the same. We will honor the request to delete unless one of the following exceptions applies:
  - **Transactional:** Information that is necessary to complete a transaction or contract for which it was collected.
  - **Security:** To detect, prevent, or investigate security incidents.
  - **Error Correction:** To identify and repair any errors or bugs.

- **Non-identifying information:** To help diagnose problems and administer our site, information such as your IP address, browser type, and operating system may be gathered, but do not identify any individual.
- **Legal:** to comply with applicable laws or legal obligations, to protect against fraud or illegal activity, or to ensure the right of a consumer to exercise rights, such as free speech rights.
- **Internal Use:** to use in a lawful manner that is reasonably aligned with the expectations of the consumer and the context in which the consumer provided the information (i.e., improve our services).
- **Right to Opt Out of Sales or Sharing.** You may opt out of us sharing your information by submitting a request.
  - We process opt out preference signals, such as the Global Privacy Control, as required by the CCPA. These signals set the opt-out of sale and sharing preferences for particular browser or device you are using. For information about how to use global privacy control, please visit: <https://globalprivacycontrol.org>.
  - You can manage your preferences through the cookie widget or the “Do Not Sell or Share My Personal Information” link on the website.
  - Submit a request by using the link provided in “[How May I Make A Request](#)” section below.
- **Right to Nondiscrimination.** We will not discriminate against you, and we will not charge you a different price or provide a different level of service for exercising your CCPA rights. 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.
- **Right to Correct Inaccurate Personal Information.** You can request correction of any inaccurate Personal Information we have about you.
- **Right to Limit.** Upon your direction, we will limit the use and disclosure of sensitive Personal Information collected about you, such as only using this information to provide you with the services you requested. We do not use or disclose your Sensitive Personal Information for purposes other than permitted by the CCPA.

## Your California Privacy Rights

California’s “Shine the Light” law permits customers in California to request certain details about how certain types of information are shared with third parties for those third parties’ own direct marketing purposes. If you are a California resident, you may opt-out of such sharing by following the instructions available under the “[How May I Make A Request](#)” section below.

Please be aware that most of the information we collect may be governed by other laws and not the CCPA, such as the Gramm-Leach-Bliley Act (“GLBA”).

### **Additional Privacy Disclosures**

If you reside in a U.S. state or other region that has enacted a comprehensive consumer data privacy law, you may have one or more of the following rights listed below. We will honor requests received only to the extent required by applicable law and within the time provided by law. None of the rights are absolute and are subject to legal and regulatory exceptions and exemptions. We will not discriminate against any individual who submits a request through our Privacy Rights request process defined below:

- Request access to categories and specific pieces of personal information about you.
- Request that we correct inaccurate or incomplete personal information about you.
- Request deletion of personal information about you unless one of the following exemptions applies:
  - Transactional: information necessary to complete a transaction or contract for which it was collected.
  - Security: To detect, prevent, or investigate security incidents.
  - Error Correction: To identify and repair any errors or bugs.
  - Non-identifying information: To help diagnose problems and administer our site, information such as your browser type, and operating system may be gathered, but do not identify any individual.
  - Legal: To comply with applicable laws or legal obligations, to protect against fraud or illegal activity, or to ensure the right of a consumer to exercise rights, such as free speech rights.
  - Internal Use: To use in a lawful manner that is aligned with the expectations of the consumer and the context in which the consumer provided the information (i.e., improve our services).
  - Request restrictions, temporarily or permanently, on our processing of some or all personal information about you;
- Request transfer of personal information to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated; and
- Opt-out or object to our use of personal information about you where either:
  - Our use is based on your consent or our legitimate interests, or
  - You do not want us to share with third parties subject to certain exceptions.

## **Montana Consumer Data Privacy Act Disclosure**

We do not engage in profiling consumers in furtherance of automated decisions that produce significant legal consequences as those terms are defined under the Montana Consumer Data Privacy Act.

## **Minnesota Consumer Data Privacy Act Retention Disclosure**

We keep your information for as long as it is required to fulfill the products or services relevant to the “Identified Purposes” as defined in this Privacy Policy, as permitted or as required by law, or otherwise communicated to you.

## **Oregon Consumer Privacy Act Profiling Disclosure**

We do not engage in profiling consumers in furtherance of automated decisions that produce legal or similarly significant effects, as those terms are defined under the Oregon Consumer Privacy Act.

## **Oregon Consumer Privacy Act Controller Entity Disclosure**

The controller entities that are subject to the PetPlace Privacy Policy and this disclosure include Independence Pet Holdings, Inc.®

## **How May I Make a Request?**

You may make a request using one of the methods below:

- Submit a [Privacy Rights Request](#)
- Sending us a request via mail to:

Attn: Privacy Officer  
Independence Pet Insurance Co.  
11333 North Scottsdale Road, Suite 160  
Scottsdale, AZ 85254

## **What Do I Need to Provide When Making a Request?**

To verify your identity when you are making a request, you may need to provide the following information if applicable:

- Name
- Telephone number
- Mailing address
- Email address

We will match this information to the information in our systems and under certain circumstances may request additional information via email or telephone to ensure we are interacting with the correct individual. We will maintain a record of your request.

Please be aware that we do not accept or process requests through other means (e.g., via fax, chats, social media, etc.).

### **May I Use an Authorized Agent?**

If you wish to designate an authorized agent to act on your behalf, you must provide the authorized agent with written permission to do so, and your authorized agent must submit that written proof at the time they make the request on your behalf.

### **Privacy Request Verification Process**

If you (or your authorized agent) make any request related to your personal information, we will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. We will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email or other means and match at least four pieces of personal information we have previously collected from you before granting you access to, or erasing, specific pieces or categories of personal information, or otherwise responding to your request. We may require written documentation which demonstrates that a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney.

### **May I Make Multiple Requests?**

If you wish to make multiple requests under this section, we recommend sending the deletion request last, as we will not be able to fulfill your other requests once we have deleted your information.

### **How Long Will It Take to Process My Request?**

For verifiable consumer requests related to opting out of the sharing of data, we will respond within 10 days of receiving the request.

For all other requests, we will respond to a verifiable consumer request within forty-five (45) calendar days of receipt. If necessary, we may require an additional forty-five (45) calendar days, at which point we will inform you of the reason and extension period in writing. We will provide an explanation in the event we are unable to process a request in whole or in part.

### **Changes to Our Privacy Policy**

If we decide to make any changes to our privacy policy, those changes will go into effect on the effective date posted in the notice at the top of the revised privacy policy. The most current version

of the privacy policy will apply to all current and past visitors to our websites and will replace any prior policies that are inconsistent. Your continued use of our websites and other services constitutes your acceptance of the practices described in the most current privacy policy.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us:

Email: [privacy@ipgpet.com](mailto:privacy@ipgpet.com)