

# FACTS

## WHAT DO ICW GROUP COMPANIES DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- *Identifiers* such as your Social Security Number or tax ID number, real name, alias, street address, mailing address, email address, IP address, unique personal identifiers, account number, date of birth, passport number, driver license or state identification, number, or similar identifiers;
- *Personal data* including personal identifiers, signature, physical characteristics or description, telephone numbers, insurance policy numbers, insurance claim numbers, education, employment information including job history and earnings, banking information, financial data and account numbers, health and medical information, health insurance information, driving and motor vehicle records, accident history, consumer reporting agency and credit bureau reports; and inferences drawn from personal data that may reflect on your personal preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes;
- *Protected classification characteristics*, such as age, race, color, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status;
- *Claims data*, including insurance claim history, transaction or loss history, data about past and present claims, which may include data regarding your health, injuries, physical, personal and financial damages suffered, criminal convictions, third party reports, and other personal data;
- *Internet & network activity, and commercial information*, browsing and search history, data associated with your interaction with websites, computer or digital applications, responses to advertisements; and
- *Insurance, business, and financial information*, including financial information, billings, account balances and payment histories, account transactions and transaction histories, credit and overdraft histories, information obtained in connection with any application for insurance or renewal of insurance, and records of products and services applied for, considered or purchased.

### How?

All financial companies need to share personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' or your personal information; the reasons ICW Group chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does ICW Group share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	Yes	Yes

<p><b>To limit our sharing</b></p>	<ul style="list-style-type: none"> <li>■ <b>Call toll-free (866) 442-9477</b> - our menu will prompt you through your choice(s) <b>or</b></li> <li>■ Visit us online: <a href="https://www.icwgroup.com/about/legal-notice/">https://www.icwgroup.com/about/legal-notice/</a> <b>or</b></li> <li>■ <b>Mail the form below</b></li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
<p><b>Questions?</b></p>	<p>Call toll-free <b>(866) 442-9477</b> or go to <a href="https://www.icwgroup.com/about/legal-notice/">https://www.icwgroup.com/about/legal-notice/</a></p>

Mail-in Form	
<p>Mark any/all you want to limit:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes.</li> <li><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</li> <li><input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.</li> </ul>	
<b>Name</b>	
<b>Address</b>	
<b>City, State, Zip</b>	
<b>Account Number</b>	
<p><b>Mail to:</b></p> <p>ICW Group Holdings, Inc  <u>Attention: Law Dept.</u>                      15025 Innovation Drive                      San Diego, CA 92128  <a href="mailto:dataprivacy@ICWgroup.com">dataprivacy@ICWgroup.com</a></p>	

## Who we are

### Who is providing this notice?

ICW Group Holdings, Inc. and subsidiaries (“**ICW Group**”), including without limitation Insurance Company of the West, Explorer Insurance Company, VerTerra Insurance Company, ICW National Ins. Co., ICW Casualty Ins. Co., ICW Premier Ins. Co, On Point Risk Solutions, Inc., and Risk Insurance Brokers.

## What we do

### How does ICW Group protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

### How does ICW Group collect my personal information?

We collect your personal information, for example, when you

- Apply for an insurance policy, a renewal, or reinstatement of an insurance policy
- Apply for a change in the coverage provided under your policy or for any change in the terms or conditions of the policy
- Submit a claim or apply for benefits under your policy
- Fail to perform your obligations under an ICW Group insurance policy or obligations related to any pending claim or application for insurance benefits

### Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

### What happens when I limit sharing for an account I hold jointly with someone else?

N/A

## Definitions

### Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Our affiliates include companies engaged in the business of insurance, as listed above in answer to the question, “Who is providing this notice?”

### Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Nonaffiliates we share with may include other insurance companies, agents, brokers, claims adjusters and examiners, banks and other financial institutions, and third-parties identified to you by ICW Group, including parties named on ICW Group websites, or for whom links to sites hosted by such third-parties may be found on ICW Group websites.

### Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- ICW Group does not jointly market at the present time.

## Other important information