



## **CALIFORNIA PRIVACY NOTICE (CCPA-CPRA)**

**IN ADDITION TO OUR GENERAL PRIVACY POLICY STATEMENT POSTED [HERE](#), WHICH APPLIES TO ALL CONSUMERS, THIS POLICY PERTAINS TO CALIFORNIA CONSUMERS ONLY.**

This notice is prepared pursuant to the California Consumer Privacy Act of 2018 (“CCPA” or “the Act”) which gives California residents (“Consumer” or “you” or “your”) the right to know what categories of Personal Information (“PI”) TRISTAR Insurance Group, Inc., its subsidiaries and affiliates (collectively “TRISTAR” or “the Company” or “we” or “us”) collects about you, and how and for what purposes the PI is used. While TRISTAR does not sell your PI, it does collect, use, and share PI for the purpose of administering your claims or offering you employment opportunities. This notice outlines and explains how you may exercise your rights to request that we: (1) provide certain PI that we have collected about you during the past 12 months, or (2) delete certain PI that we have collected.

Under the CCPA, “personal information” is defined to be “information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” It includes but is not limited to “identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers”, “biometric information”, “geolocation data”, et al. “Personal information” does not include publicly available information. For these purposes, “publicly available” means information that is lawfully made available from federal, state, or local government records.

### **Typical Categories of Personal Information that we collect:**

TRISTAR collects and discloses PI only for the purposes of administering your claim, providing related services to you, or offering you employment opportunities. Such collection shall occur when you submit a claim or send in an employment application. The PI we collect and disclose may include:

1. Personal Identifiers such as your name, any alias, your mailing address, telephone number, email address, gender, date of birth, Social Security number, Driver’s License number, passport number, your signature, your digital signature, and other similar identifiers;

2. Personal information, including employment information, medical and health information, medical exams, reports, tests, procedures, and prescriptions.
3. Financial and banking information such as bank account number, credit/debit card number, income and tax information;
4. Characteristics of protected class or groups under state or federal law, including birthday, sex, marital status and the like;
5. Commercial information, including the purchase of any medical or non-medical equipment relating to your claim;
6. Internet or other electronic network activity information, including, but not limited to, IP address, browsing and search history, and information regarding a consumer's interaction with TRISTAR;
7. Geolocation data such as physical location or movements;
8. Audio, electronic, visual, thermal, or similar information such as voice messages, recorded statements and video evidence;
9. Professional or employment-related information;
10. Education information;
11. Policy information, such as our policy number, policy start and end dates, premiums, individual terms, claims history and claims data, mid-term adjustments, reasons for cancellation, risk profile and details of policy coverage;
12. Claim information, such as claimant's relationship to policyholder/insured, and the date and particulars of such claim, including causes of death, injury or disability and claim number;
13. Events or meeting information, such as details about your visits to our offices (including CCTV), your interest in and attendance at events or meetings, audio recordings, photographs or videos captured during meetings, events, or calls with you;
14. Marketing information, such as your consent to or opt-out from receiving marketing communications from us and/or third parties, your marketing preferences, or your interactions with our marketing campaigns and surveys, including whether you open or click links in emails from us or complete our surveys.
15. Websites and communication usage information, such as your username, your password, other information collected by visiting our Websites or collected through cookies and other tracking technologies, including your IP address, domain name, your browser version and operating system, traffic data, location data, browsing time, and social media information, such as interactions with our social media presence.
16. Special category data and sensitive personal data, such as data relating to your health (including protected health information), genetic or biometric data, sexual orientation, gender identity, racial or ethnic origin;
17. Criminal records information, such as criminal charges or convictions, including driving offenses, or confirmation of clean criminal records;
18. Professional disciplinary information; and
19. Inferences drawn from any of the information identified above.

### **How we collect Personal Information**

TRISTAR collects your PI from a variety of sources. For example, we may collect PI when you

request an employment benefit, insurance coverage or submit a claim to us. The following are the categories of sources from which we may collect your PI:

- Directly from you and your direct interactions with us regarding an insurance, claim, benefits or employment matter;
- Indirectly from you through your authorized representative, insurance agent/producer/broker; legal counsel, medical provider; our claims adjusters; or other third party service providers or business partners;
- Through our websites, when you send us an email or complete a web form making a request regarding your PI;
- From government agencies or public records;
- Through automated technologies and online browser tools, including the use of cookies; and
- From TRISTAR affiliate companies, third-party service vendors, or business partners.

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

We may use, share, or disclose the PI we collect for one or more of the following business purposes:

- Administering insurance claims under an insurance policy or self-insured program, for an employee or governmental benefit and to enable us to make decisions about such claims or benefits;
- Responding to insurance regulator and law enforcement inquiries and investigations;
- Exercising a right, or complying with an obligation, arising in connection with an insurance claim, including a legal right or obligation; or
- Performing statistical analysis in the ordinary course of administering claims:
  - To maintain, customize, and secure your claims information with us;
  - To comply with applicable law, court order, or governmental regulations, including required record retention;
  - To process your requests, transactions, and prevent fraud;
- Communicating with you and providing you with support and responding to your inquiries, including employment-related matters, investigating and addressing your concerns and monitoring and improving our responses;
- Helping to maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business;
- For testing, research, analysis, and service development, including developing and improving our services;
- Collecting your PI for purposes of contacting you, sending benefit payments to your direct deposit account, calculating your benefits, and other claim purposes.

Effective January 1, 2020

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- Advertising, marketing, and promoting our services or the services of others, including by newsletters, email, LinkedIn, SMS, USPS or telephone.
- Monitoring usage of our websites and to personalize your experience with our websites.

We do not collect, use or share your PI without you submitting a claim, a request or an application, or otherwise providing authorization.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

**Categories of Third Parties with whom we share Personal Information:**

The categories of third parties with whom we disclose your PI for a business purpose is subject to an agreement by the third party to keep the information confidential and use it only for the specific business purpose. These third parties may include:

1. Third party health providers whom you may be receiving medical treatment from;
2. Third party vendors whom we have retained to secure your information;
3. Third party companies who provide services for your claims or application, including, insurance companies, insurance brokers, attorneys; and
4. Applicable governmental and regulatory agencies.
5. Service Providers whose services require collection of aggregated data for us to provide and analyze claims services.

**Under the CCPA, upon verification, you have the right by submitting a “Privacy Rights Request Form” to request that we disclose:**

- The nature of your PI we collected, used, disclosed and sold, if any, about you over the past twelve (12) months;
- The purpose of the collection, usage, disclosure;
- The specific piece of PI that was collected, used, disclosed, or sold; and
- The categories of third parties to whom we disclosed and sold the information.

**Your CPRA consumer rights**

Where we are acting as a business (as opposed to a service provider as those terms are defined in the CPRA), you have the following rights:

**Right to access**

You have the right to request access to personal information collected about you and information regarding the source of that information, the purposes for which we collect it, and the categories of third parties and service providers with whom we share it.

**Right to data portability**

You have the right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.

**Right to delete**

You have the right to request in certain circumstances that we delete personal information we have collected directly from you. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

**Right to correction**

You have the right to request the correction of your personal information or, where the accuracy of the information is in dispute, to supplement the information to provide notice that you dispute its accuracy.

**Exercising your rights**

You may exercise your rights to know, delete and correct as described above by submitting a verifiable request to us by either:

- Email to: [privacy@tristargroup.net](mailto:privacy@tristargroup.net) including sufficient information to verify your identity; or
- Complete the [Privacy Rights Request Form](#)

**Information verification and Subsequent Actions:**

Only you, or a person that you authorized to act on your behalf, may make a request related to your PI. In the case of access, your information must be verifiable before we can fulfill your request.

Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected the PI or a person that is authorized to act on your behalf.

In addition, the CCPA makes certain exceptions to providing PI when we respond to or process a Privacy Rights Request Form asking for access to or deletion of PI information. For example, we would not provide PI about another individual where doing so could negatively affect the privacy rights of that individual.

**Notice pursuant to CPRA Section 7011(e)(1)(G)**

We do not sell or rent to anyone the personal information you have provided to us, nor the personal information of minors under sixteen (16) years of age to third parties.

**Other California Privacy Rights**

California's "Shine the Light" law permits users of our websites who are California residents to request certain information regarding our disclosure of personal information to affiliates and other third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@tristargroup.net](mailto:privacy@tristargroup.net).

**We reserve the right to change or update this notice periodically. When we do, we will post the revised notice on our website at [tristargroup.net](http://tristargroup.net) under the “California Privacy Notice” link.**