

National General Producer Privacy Statement

Effective: 01/01/2023

National General Insurance Company, Encompass Insurance, and Allstate Independent Agents (“Business”, “we”, “our” or “us”) operate through a network of producers, including independent agents and brokers, to sell our services and products and assist our customers. As part of our relationship with you, our prospective, current and former agents (“you”, “your”), we collect, use, and share your personal information. This privacy statement describes our privacy practices relating to the collection, use, and sharing of personal information of prospective, current, and former agents.

INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect personal and other information about you. Personal information is data that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you. Other information does not and cannot reveal an individual’s identity such as information that has been de-identified or aggregated.

We collect personal information about you in several ways from several sources. We collect personal information directly from you as part of our business relationship, including but not limited to personal information provided in connection with the onboarding, enrolling, referral, and quoting processes, as well as information necessary to facilitate commission payments. We collect information automatically from you when you use our websites, view our emails, or otherwise engage with us through a computer or mobile device (“Sites”). We also collect personal information about you from third parties such as consumer reporting agencies and data providers to run credit reports or do background checks. We do not knowingly collect any information from children under the age of sixteen.

The following are the categories of personal information we have collected and shared for at least the past 12 months, and examples of the personal information that fall into those categories:

Personal information categories	Examples
Personal identifiers	Name, alias, signature, postal address, email address, unique personal identifier, online identifier, internet protocol (IP) address, phone number, date of birth, Social Security number, driver’s license number, state identification number, and passport number.
Personal characteristics	Age, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression), pregnancy or childbirth and related medical conditions, veteran or military status, and other description of your physical characteristics (e.g., height).

Professional information	Producer number, agent number or other professional license number, bank account or credit card number or other payment or financial information, employer tax identification number, professional history, or employment-related information.
Biometrics and multimedia information	Audio, photo, electronic, visual or other recordings.
Internet or other electronic network activity information	Information regarding your interaction with our website, application or advertisement, links you use or web pages you visit while visiting our site or applications, browser type, or internet service provider (ISP).

Sensitive Personal Information

Some personal information we collect is defined under the law as sensitive personal information. Sensitive personal information we collect includes your social security number, driver’s license number, state identification card_number, passport number, account log-in information, and financial account numbers.

We use sensitive personal information only as reasonably necessary to maintain our business relationship, to maintain your accounts, process payments, to detect security incidents, resist malicious, deceptive, fraudulent, or illegal actions and to prosecute those responsible for those actions, to ensure peoples’ physical safety, or other reasons that do not require an opt-out of this use.

USE OF YOUR INFORMATION

We use personal information collected from or about you for business purposes including to:

- Process your information for onboarding including determining eligibility or qualifications for establishing our business relationship,
- Manage and maintain our business relationship including to identify and review your qualifications, process commission and other payments, update or correct our records, or provide you with technology needed for your agency role,
- Advertise or market to consumers about your professional services to generate business leads for you,
- Comply with legal requirements, assist in an investigation, comply with requests from regulatory and law enforcement authorities and meet contractual obligations,
- Communicate with you via email, mail, or other methods about our business, including opportunities, technology, or services offered or other information relevant to our business relationship,

- Protect the safety and security of our business, services, and Sites including to prevent suspected fraud, threats to our network or other illegal activities, prevent misuse or for any other reason permitted by law, and
- Carry out other activities required in the normal course of our business relationship with you.

RETAINING YOUR INFORMATION

We retain personal information in accordance with applicable laws or regulatory requirements and also for as long as necessary to fulfill the purposes for which it was collected and to fulfill the business or commercial purposes that are explained in this Privacy Statement.

SHARING YOUR INFORMATION

We do not sell your personal information. We may share your personal information with our affiliates for business purposes consistent with the uses described in this Privacy Statement. We may also share information about you with third parties whenever you consent to or direct such sharing. We strive to work with companies that share our commitment to privacy. We may also share information with others in an aggregated or de-identified form that does not reasonably identify you.

We may also share your personal information with third parties for business purposes or as required or permitted by law including with:

- **Service providers:** We may share personal information with service providers who perform services on our behalf for business purposes described above in “Use of Your Information” such as administering commission payments. We may also share personal information with marketing companies who will advertise your agency to generate business leads for you.
- **Third parties in connection with a business transaction:** Personal information may be disclosed to third parties in connection with a corporate transaction, such as a merger, sale of any or all of our company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by an affiliate or third party, or in the event of a bankruptcy or related or similar proceedings.
- **Law enforcement, regulators and other parties for legal reasons:** Personal information may be disclosed to third parties, as required by law or subpoena, or if we reasonably believe such action is necessary to:
 - comply with the law and the reasonable requests of regulators, court orders, law enforcement or other public authorities, such as a subpoena, government audit or search warrant,

- comply with a contract or as necessary to establish, exercise, or defend against potential, threatened, or actual litigation,
- protect us, your vital interests, or those of another person, and
- investigate fraud or to protect the security or integrity of our Sites, tools, facilities, or other individuals.

Depending on the circumstances, we may share any of the listed categories of personal information with the above categories of third parties.

Use of tracking technology information: We or our service providers may use the information collected through tracking technologies to improve, enhance, and personalize your experience, to monitor and improve our Sites and for other internal purposes such as to:

- Remember information so that you will not have to re-enter it during your visit or the next time you visit the Sites,
- Provide and monitor the effectiveness of our Sites,
- Perform analytics and detect usage patterns on our Sites,
- Diagnose or fix technology problems,
- Detect or prevent fraud or other harmful activities, and
- Otherwise to plan for and enhance our Sites.

CALIFORNIA CONSUMER PRIVACY ACT RIGHTS:

California residents have certain rights under the California Consumer Privacy Act (CCPA) to access, correct, and delete personal information, and other rights described below.

Right to Know and Access Your Personal Information: You have the right to request the specific pieces of personal information we have collected about you—and the right to know:

- the categories of personal information we've collected,
- the categories of sources from which personal information was collected,
- the business purpose for collecting the personal information, and
- the categories of third parties with whom we disclose or share personal information.

Right to Deletion of Personal Information: You have the right to request deletion of personal information collected from you, subject to certain exceptions including that we need the personal information to:

- Complete a transaction or service you requested, service your account, or take other actions reasonably anticipated or aligned within the context of our ongoing business relationship,
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities,
- Comply with a legal obligation, or

- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Right to Correct Personal Information: You have the right to request we correct any inaccurate information we have about you. We may request that you provide documentation to support your request and we will correct your information unless we determine that the personal information is more than likely accurate.

Non-Discrimination Rights: We don't discriminate against you if you exercise any of the privacy rights described in this privacy statement.

Verified Requests: To protect you and your personal information, we will only respond to requests to know, access, delete, or correct that we have been able to properly verify through our authentication processes. To verify your identity, you will be asked to provide some of personal information, such as name, birth date, and/or the last four digits of your Social Security number, which we only use to verify your identity or authority to make the request.

You may also make requests to know, access, review, delete, or correct your personal information through an authorized agent if you give the agent signed permission to submit the request. If an authorized agent submits a request on your behalf, we may ask you to verify your identity and confirm that you provided the authorized agent permission to submit the request.

Submitting a Request: To submit an access, deletion, or correction request:

Call the toll-free-number at 833-303-2724 or email NGIA@nghcprivacy.com to submit a request. You should not send personal information aside from name and state in your initial email. Please indicate you are an independent agent or broker in your initial email or voicemail.

Responses to a verified request may take up to 45 calendar days, or longer depending on the nature of the request. If additional time is needed, we will notify you of the additional time. We may only respond to two access requests within a 12-month period. Requests from authorized agents must be submitted via email, and the authorized agent will be required to verify their identity with us.

Security

The security of your personal information is important to us. We use a combination of reasonable technical, administrative, and physical safeguards to protect your personal information. However, no website, mobile application, database or system is completely secure or "hacker proof." So, we cannot guarantee its absolute security. You are also responsible for taking reasonable steps to protect your personal information against unauthorized disclosure or

misuse and to follow and implement all policies and practices to protect personal information collected by us.

We limit access to your personal information to those who need it to do their jobs. We comply with all applicable federal and state data security laws.

Contact us

If you have questions or concerns about our privacy practices, please contact The Privacy Team at NGHCSupport@NGHCPrivacy.COM.

Changes to our privacy statement

We may periodically update or revise this Privacy Statement. The date at the top of this page shows when this Privacy Statement was last revised. We will let you know when we update the Privacy Statement by changing the date or other appropriate means.