

ICW Group Holdings, Inc. and its affiliates (collectively, "ICW Group") have established this California Privacy Policy in accordance with the provisions of the California Consumer Privacy Act and related regulations, as amended by the California Privacy Rights Act ("CCPA"). This California Privacy Policy is subject to all lawful exclusions and exceptions to application of the CCPA. For example, the CCPA does not generally apply to (i) information collected subject to the federal Gramm-Leach-Bliley Act, as implemented per the California Financial Information Privacy Act; (ii) certain medical and health information governed by California state laws or as covered by HIPAA; and (iii) other instances as provided by law.

This California Privacy Policy applies solely to individuals who reside in the State of California (referred to as, "consumers" or "you"). Information regarding ICW Group's general procedures and policies applicable in other states may found here: <https://www.icwgroup.com/about/legal-notice/>

## CCPA NOTICE AT COLLECTION

This policy is to inform California residents of ICW Group's practices regarding the collection, use, disclosure and sale (if any) of personal information. The categories of information that ICW Group may collect, sources of the information, purposes for collecting it, and how ICW Group uses information, are described below.

The following summarizes the categories of personal information that ICW Group may collect, the categories of sources from which we may obtain the information, the purposes for which it is collected, and whether or how ICW Group may disclose, sell or share it with others. ICW Group has not sold, transferred for value, or shared any category of personal information with a third party for marketing purposes in the past 12 months .

### **A. Identifiers such as your real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers**

ICW Group may collect such information from you, directly or indirectly through activity on our website, from your employer, from medical records, or from third parties that interact with us in connection with the products or services we provide. See also Sensitive information Categories L-1 and L-2 below.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information

to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

**B. Personal information as defined in the California Customer Records Act, Civ. Code Sec. 1798.80(e), including without limitation your signature, physical characteristics or description, street address, telephone number, insurance policy number, educational information, work and employment information, performance reviews, employment history, financial information, and health insurance information.**

ICW Group may collect such information from you, directly or indirectly through activity on our website, from your employer, from medical records, or from third parties that interact with us in connection with the products or services we provide. See also Identifiers Category A above; and Sensitive information Categories L-1, L-2, L-4 & L-8 below.

• **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

• **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

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ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

**C. Characteristics of protected classifications under California or federal law, including without limitation a consumers age, ancestry, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and relate medical conditions), veteran or military status, and familial genetic information.**

ICW Group may receive this information if you or your employer provide it to us. Such information is sometimes revealed in medical records or other information provided by third parties in the course of making or processing a claim for insurance benefits. See also Sensitive information Categories L-1, L-2, L-4, L-6, L-8 and L-9 below.

• **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To

present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### **D. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies**

ICW Group may receive such information if you provide it to us, or if revealed in medical records or other information provided by third parties in the course of making or processing a claim for insurance benefits. See also Sensitive information Categories L-2 and L-5 below.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

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ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

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ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### E. Biometric information

ICW Group may receive such information from you if you provide it to us, directly or indirectly. Such information is sometimes revealed in medical records or other information provided by third parties in the course of making or processing a claim for insurance benefits. See also Sensitive information Categories L-6 and L-8 below.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value.

### F. Internet or other electronic network 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

ICW Group may receive such information from you, directly or indirectly. See also Sensitive information Categories L-2 and L-5 below.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates

or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### G. Geolocation data

ICW Group may receive such information from you, directly or indirectly. Location information is sometimes revealed in medical records or other information provided by third parties in the course of making or processing a claim for insurance benefits. See also Sensitive information Category L-3 below.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information** (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:

ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### H. Audio, electronic, visual, thermal, olfactory, or similar information

ICW Group may receive such information from you, directly or indirectly, such as through your telephone and email communications with our company. Such information is sometimes revealed in medical records or other information provided by third parties in the course of making or processing a claim for insurance benefits. See also Sensitive information Categories L-2, L-5, L-6 and L-8 below.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and

as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### I. Professional or employment-related information

ICW Group may collect such information from you, directly or indirectly, through activity on our website, from your employer, from medical records, or from third parties that interact with us in connection with the products or services we provide. See also Sensitive information Category L-5 below.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### J. Education information

ICW Group may collect such information from you, directly or indirectly, through activity on our website, from your employer, from medical records, or from third parties that interact with us in connection with the products or services we provide.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### K. Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

ICW Group does not collect or process Sensitive personal information for purposes of creating a profile about an individual inferring characteristics about a consumer in their individual capacity. It could potentially be possible for someone to draw inferences from personal information received from you, directly or indirectly, through your activity on our website, in your communications with ICW Group, from your employer, from medical records, or from third parties that interact with us in connection with the products or services we provide. See also Sensitive information Categories L-1 through L-9 below.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties;

Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has not disclosed such information to third parties for business purposes in the past 12 months.

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### **L-1. Sensitive personal information Social Security number, driver's license, state identification card, or passport number**

ICW Group may collect such information from you, directly or indirectly through activity on our website, from your employer, from your medical records, or from third parties that interact with us in connection with the products or services we provide.

- **Purposes for Collection:**  
For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.
- **Third Parties to Whom ICW May Disclose Your Information:**  
ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.
- **Third Parties with Whom ICW May Share Your Information** (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:  
ICW Group does not sell or share any individuals Social Security number, drivers license or state ID number or passport number (a) for marketing purposes, (b) nor as part of a sale or transfer of personally identifiable information in exchange for value.

### **L-2. Sensitive personal information – Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account**

ICW Group may collect such information from you, directly or indirectly through activity on our website, or from third parties that interact with us in connection with the products or services we provide.

- **Purposes for Collection:**  
For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To



present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

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### L-3. Sensitive personal information – Precise geolocation

ICW Group does not intentionally collect or retain precise geolocation information about consumers.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

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ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### L-4. Sensitive personal information Racial or ethnic origin, religious or philosophical beliefs, or union membership

ICW may receive such information from you, directly or indirectly. Such information is sometimes revealed in medical records or other information provided by third parties in the course of making or processing a claim for insurance benefits.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### L-5. Sensitive personal information – Contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication

ICW Group does not collect, request or retain mail, email or text messages unless an authorized ICW Group representative is the sender or an intended recipient of the communication. ICW Group does not authorize its employees to use company mail, email, or other messaging or communications systems for personal purposes.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law. ICW Group does not sell, rent out, or share with third-parties any cookie consent or consent to use of short message service (SMS), verbatim content of text messaging, or originator opt-in data. ICW Group may share contact information and the substance of information received from users with third-parties as reasonably necessary for ICW Group to provide its products and services to the user or as otherwise permitted by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance

regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information** (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:  
ICW Group may share information concerning companies applying for and owners of ICW insurance policies (a) with our affiliates or other financial companies for marketing purposes, or (b) as part of a sale or in exchange for value in connection with accounts receivables management, credit, collections, and similar financial matters. ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### L-6. Sensitive personal information – Genetic data

ICW may receive such information from you, directly or indirectly. Such information is sometimes revealed in medical records or other information provided by third parties in the course of making or processing a claim for insurance benefits.

- **Purposes for Collection:**  
For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.
- **Third Parties to Whom ICW May Disclose Your Information:**  
ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.
- **Third Parties with Whom ICW May Share Your Information** (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:  
ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### L-7. Sensitive personal information – Processing of biometric information for the purpose of uniquely identifying a consumer

ICW Group does not process biometric information for the purposes of uniquely identifying consumers.

- **Purposes for Collection:**  
For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis,

modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has not disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### **L-8. Sensitive personal information – Personal information collected and analyzed concerning a consumer's health**

ICW Group may collect such information from you, directly or indirectly through activity on our website, from your employer, from your medical records, or from third parties that interact with us in connection with the products or services we provide.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:**

ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

### L-9. Sensitive personal information – Personal information collected and analyzed concerning a consumer’s sex life or sexual orientation

ICW Group may receive such information if you provide it to us. Such information is sometimes revealed in medical records or other information provided by third parties in the course of making or processing a claim for insurance benefits.

- **Purposes for Collection:**

For everyday business purposes; For insurance applications, contracts, transactions, claims and benefit determinations; To support, change, improve and develop our products and services; To fulfill the reasons for which personal information was provided; For human resource purposes if you are a job applicant, past or present employee, officer, director or independent contractor; To present our website content to you; To notify you of changes to our website, policies, products or services; For research, analysis, modeling, marketing, or advertising purposes; Fraud detection and prevention; To respond to law enforcement requests and as required by applicable law, court order or governmental regulation; To protect the rights, property or safety of ICW Group, our partners, employees and others; To help maintain the safety, security and integrity of our systems, services, databases and other assets; and For other purposes as allowed by law.

- **Third Parties to Whom ICW May Disclose Your Information:**

ICW Group affiliates; Insurance agents, brokers, adjusters and examiners; Service providers, contractors and similar third parties; Your employer or our policyholder in connection with a claim for benefits or insurance coverage; Governmental agencies, insurance regulators or law enforcement officials; Credit bureaus, collection agencies, and similar parties providing financial services, and accounts receivables analysis or servicing; and Other financial companies for joint marketing purposes. ICW Group has disclosed such information to third parties for business purposes in the past 12 months.

- **Third Parties with Whom ICW May Share Your Information** (a) for Marketing purposes, or (b) as part of a sale or in exchange for value received by ICW Group:

ICW Group does not share or sell this type of information to third parties for marketing purposes or in exchange for value if such information is personally identifiable to individuals acting for non-business purposes, such as individuals presenting claims for injuries, benefits or damages; job applicants; or past or present ICW Group employees, officers or directors.

**Length of Time ICW Group Keeps Your Information:** ICW Group maintains business records for the duration of each applicable matter, transaction or business relationship; for such time as may be necessary to achieve the business purposes for which information is collected; as needed to retain historical data for legal, tax and audit purposes; for regulatory compliance or law enforcement needs; to protect the rights, property or safety of ICW Group, our affiliates, employees and others; for the safety, security and integrity of our systems, services, databases and other assets; as required by law; and in accordance with professional advice received from ICW Group’s lawyers, accountants, auditors and tax advisors.

## California Consumer Privacy Rights

The CCPA provides all California consumers with the following rights over personal information that is identifiable to you:

- **The Right to Know about your personal information:** You have the right to request that a business tell you what personal information it collects about you. Descriptions of the types of information that ICW Group may collect are shown in the charts below.
- **The Right to Delete your personal information:** You have the right to request the deletion of personal information if you believe that ICW Group does not have, or no longer has, a sufficient reason to keep your information. If you make such a request and ICW Group agrees, we will remove your information from our records. If we deny your request, we will provide a written explanation of the reason for such denial.
- **The Right to Correct:** If ICW Group’s records contain incorrect information about you, you may submit a written request telling us what is inaccurate and what needs to be changed to make it correct.

- You may submit a verifiable consumer request for any of the purposes listed above at <https://www.icwgroup.com/consumerprivacy> or by calling (866) 442-9477.
- Be sure to specify which of your CCPA rights you wish to exercise.
- The details included with your request will guide how we respond. Our online form has spaces for you to include: the nature of your request; a summary of the information involved; the consumer's relationship with ICW Group (injured worker, claimant, job applicant, employee, other); and the consumer's name, street address of primary residence, and contact information.
- Only you or someone legally authorized to act on your behalf may submit a request. Before we respond, you will need to identify yourself as the individual about whom ICW Group has collected information. We may ask you to confirm one or more pieces of information from our files to verify the consumer's identity.
- If you make a request on behalf of a California resident other than yourself, you will need to explain your relationship to the consumer, provide your name and contact information, and be prepared to submit a power-of-attorney, court order, or other written document designating you as the consumer's lawful representative for purposes of making requests of this nature. This information is required in addition to verifying the identity of the consumer.
- **The Right to Non-Discrimination:** The CCPA prohibits a business from discriminating against a consumer based on any exercise of rights under the CCPA.
- **Rights to Limit or Opt-Out of Sale/Sharing:** The CCPA allows a consumer to limit a business' use and disclosure of certain sensitive information, and to direct a business to stop sharing or selling the consumer's personal information to third parties. However, ICW Group only uses your information in ways consistent with purposes permitted under the CCPA and does not share it with third parties for marketing purposes, nor does ICW Group sell your personal information to third parties.

**ICW Group does not share or disclose any personally identifiable information of any *California consumer* to any third party for marketing purposes. Similarly, ICW Group does not sell any such information to any third party. ICW Group's practices in the foregoing respects apply to individuals regardless of age, inclusive of persons both above and below age 16.** ICW Group limits its use of your sensitive information to uses that are necessary to provide its products or services, as reasonably expected by an average person, to ensure security and integrity as reasonably necessary and proportionate to its business purposes, and as authorized under the CCPA and related regulations. Accordingly, there is no need or CCPA requirement for us to provide any notice or option for you to opt out of such sale or sharing. Consumers may, however, submit requests to obtain information about the data that ICW Group has about you, and to request corrections or deletions of such information if appropriate, by contacting us online at <https://www.icwgroup.com/consumerprivacy>.

ICW Group may share or disclose information related to a **business that applies for or owns an insurance policy** for a variety of business reasons. For example, ICW Group may share business information with third parties for marketing purposes, and may sell or disclose financial information to a third party in return for consideration associated with accounts receivables management, credit, collections, and other financial matters. For additional information or to opt-out or restrict such uses of information, *policyholders may contact ICW Group online at <https://www.icwgroup.com/consumerprivacy>.* You may also submit an opt-out request using one of the other options described at <https://www.icwgroup.com/about/legal-notice/>.

The CCPA protects personal information that is personally identifiable to you. The law does not restrict, and ICW Group reserves its rights to use, share and/or sell non-personal information, information from which all personal identifiers have been removed or redacted, de-identified information, or aggregated information that we collect. ICW Group may use, sell or share such non-identifiable information for any and all purposes as permitted by law.

ICW Group will normally respond to consumer requests within 45 days of receipt of a verifiable consumer request. If additional time is needed to respond, we will notify you in writing of an additional 45-day extension, in which case our response will be due 90 days from our initial receipt of the verifiable consumer request.

ICW Group does not normally charge a fee for responding to a consumer request, but reserves the right to do so if a request is excessive,

unduly burdensome, repetitive, or manifestly unfounded. Consumers will be notified in advance of any costs or fees associated with their requests.

Exceptions may apply: ICW Group may deny a request of any nature based on applicable exceptions or exclusions provided under the CCPA or otherwise.

## ADDITIONAL PRIVACY INFORMATION FOR CALIFORNIA CONSUMERS

- ICW Group may collect information from individual consumers, from persons applying for or owning insurance policies, or from other third parties.
- The information we have collected, and any personal or privileged information that we may collect in the future, may be disclosed to third parties without further authorization when permitted by law.
- As permitted by law, ICW Group reserves the right to share your nonpublic personal and financial information with its affiliates for marketing purposes, or for other permitted purposes, without your prior written consent.
- You have rights to access and request corrections to your information. Responses to requests received by ICW Group on or after 01/01/2023 may be limited to information collected on or after 01/01/2022.
- This Privacy Policy was last updated on May 9, 2024.

**Limitations on Disclosures, Sale or Sharing of Personal Information:** ICW Group limits its use of your sensitive information to uses that are necessary to provide its products or services as reasonably expected by an average person, to ensure security and integrity as reasonably necessary and proportionate to its business purposes, and as authorized under the CCPA and regulations adopted by law pursuant to the CCPA. ICW Group does not disclose, share or sell any individual consumer's personally identifiable information to third parties for marketing purposes or in exchange for value. Accordingly, there is no need or requirement for us to provide any notice or option for you to opt out of such sale or sharing.

## How Consumers May Make Requests Concerning Your Own Personally Identifiable Data

**If you are an Individual living in California** and want to know what information ICW Group has about you, you may submit a request describing the records you want to see. You may obtain copies or request corrections or changes in the information ICW Group has about you by calling (866) 442-9477 or by submitting your request online at <https://www.icwgroup.com/consumerprivacy/>. Under California law, you have rights to:

- Ask what information ICW Group has and request copies of specific information about you;
- Ask for corrections to be made if the information we have is in error; and
- Ask to have your information deleted if you believe that ICW Group does not have, or no longer has, a current business need to keep your information.

## Additional Information for Consumers and Policy Owners

For questions about ICW Group information practices, you may contact us as follows:

- By Mail at ICW Group Holdings, Inc., Attention: Law Department, 15025 Innovation Drive, San Diego, CA 92128; or
- By Toll-free Telephone: (866) 442-9477

[icwgroup.com](http://icwgroup.com)