

PRIVACY POLICY

Ricardo Comaduran Independent Life Insurance Agent

Effective Date: September 12, 2026

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SCOPE OF THIS POLICY. This Privacy Policy ("Policy") applies to all personal information collected, used, disclosed, and otherwise processed by our life insurance agency and its affiliated websites, mobile-optimized pages, online forms, and digital services (collectively, the "Site" or "Services"). This Policy is intended to inform you—our visitors, prospective applicants, policyholders, and other users—of your privacy rights and our obligations with respect to your personal information. By accessing or using this Site, you acknowledge that you have read, understood, and agree to be bound by the terms of this Privacy Policy. If you do not agree, please discontinue use of the Site immediately.

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1. INTRODUCTION & SCOPE

1.1 Who We Are. We are a life insurance agency operating through this website (the "Site"). We provide life insurance quoting, application, and informational services. In connection with these services, we collect, use, and share personal information about visitors and users as described in this Policy. We act as both a data controller with respect to information we collect directly and as a data processor in certain contexts on behalf of insurance carriers and other partners.

1.2 What This Policy Covers. This Policy governs the personal information we collect through: (a) your visits to and interactions with this Site; (b) online quote and application forms; (c) email, telephone, text message, and other communications with us; and (d) your use of any tools, calculators, or resources offered through the Site. This Policy does not govern information collected by insurance carriers, reinsurers, or other third parties with whom you independently establish a relationship, even if you were referred to them through our Site.

1.3 Agreement to This Policy. By accessing or using this Site in any manner—including browsing, submitting a quote request, completing an application, or contacting us—you represent that you have read this Policy and agree to its terms. If you do not agree to the collection and use of your information as described herein, you should not use the Site.

1.4 Jurisdiction & Applicable Law. This Site is operated by a business domiciled in the United States. This Policy is governed by and construed in accordance with applicable federal law, including but not limited to the Gramm-Leach-Bliley Act ("GLBA"), the Telephone Consumer Protection Act ("TCPA"), the Fair Credit Reporting Act ("FCRA"), and the Children's Online Privacy Protection Act ("COPPA"). Users located in certain states may have additional privacy rights beyond those described in this general section. Without limitation, residents of California, Texas, Florida, Virginia, Colorado, Connecticut, and other states that have enacted comprehensive consumer privacy legislation may have specific rights described in greater detail in Section 11 of this Policy.

2. INFORMATION WE COLLECT

We collect information about you from several sources and in several ways. The categories of personal information we collect are described below.

2.1 Personal Information You Provide Directly

When you submit a quote request, complete an application, create an account, contact us, or otherwise interact with the Site, you may voluntarily provide us with personal information, including:

- **Identifying Information:** Full legal name, mailing address, date of birth, and Social Security Number (SSN). Your SSN is used solely for identity verification, underwriting, and regulatory compliance purposes.
- **Contact Information:** Email address, telephone number(s), and preferred method of contact.

- **Health-Related Information:** Height, weight, tobacco use status, prescription medication history, medical conditions and diagnoses, family medical history, and other health information requested during the quoting or application process. This information is necessary for underwriting and actuarial assessments conducted by insurance carriers.
- **Beneficiary Information:** Names, dates of birth, relationships, and contact information for individuals you designate as beneficiaries on an insurance policy.
- **Payment and Billing Information:** Bank account information, routing numbers, credit or debit card numbers, and billing addresses provided in connection with premium payments or application fees. Payment card data is processed through encrypted, PCI-DSS compliant payment processors and is not stored on our servers in unencrypted form.
- **Communications:** Records of your correspondence with us, including emails, chat transcripts, and telephone call recordings.

2.2 Information We Collect Automatically

When you access or use the Site, we and our service providers may automatically collect certain technical and usage information, including:

- **Device & Network Information:** Internet Protocol (IP) address, browser type and version, operating system and version, device type, device identifiers (such as mobile advertising identifiers), screen resolution, and language settings.
- **Usage Data:** Pages viewed, time and duration of visits, links clicked, search queries entered on the Site, referring URLs (the webpage from which you arrived at our Site), exit pages, and clickstream data describing your navigation through the Site.
- **Tracking Technologies:** Information collected through cookies, web beacons, pixel tags, session storage, local storage, and similar technologies as described in greater detail in Section 7 of this Policy.

2.3 Information We Receive From Third Parties

We may receive personal information about you from third-party sources, which we may combine with information we collect directly from you. These sources include:

- **Insurance Carriers & Underwriters:** Life insurance companies to which we submit applications may provide us with information about application status, underwriting decisions, and policy information.
- **Consumer Reporting Agencies, including MIB Group:** We may obtain consumer reports from credit reporting agencies and specialty consumer reporting agencies, including MIB Group, Inc. (formerly the Medical Information Bureau). MIB maintains a coded database of health-related information reported by its member insurance companies for use in underwriting. See Section 16 for additional disclosures related to MIB.
- **Third-Party Data Brokers:** We may obtain demographic, lifestyle, and contact information from reputable third-party data providers for marketing and analytics purposes, subject to applicable law.
- **Social Media Platforms:** If you choose to connect a social media account (such as Facebook or Google) to our Site or interact with our social media content, we may receive certain profile information from those platforms, consistent with your privacy settings on those platforms and their terms of service.
- **Lead Generation Partners:** We may receive contact information and expressed insurance interest from lead generation companies and affiliate partners with whom you have interacted and provided consent to share your information with insurance-related businesses.

3. HOW WE USE YOUR INFORMATION

We use the personal information we collect for legitimate business and legal purposes, including the following:

- **Life Insurance Quoting and Applications:** To generate life insurance quotes, process and submit applications to insurance carriers on your behalf, and facilitate the underwriting process.
- **Policy Servicing and Administration:** To manage active insurance policies, process premium payments, handle claims inquiries, update beneficiary designations, and provide ongoing customer service.
- **Communications:** To contact you regarding your quote, application, policy, account, or inquiry via telephone, email, text message, or postal mail, as further described in Section 4.
- **Marketing and Promotional Communications:** To send you information about life insurance products, services, special offers, and related content that may be of interest to you, where you have provided appropriate consent or where otherwise permitted by law. You may opt out of marketing communications at any time as described in Section 11.
- **Analytics and Website Improvement:** To analyze how users interact with the Site, understand traffic patterns, identify areas for improvement, conduct A/B testing, and optimize user experience.
- **Fraud Prevention and Security:** To detect, investigate, and prevent fraudulent transactions, unauthorized access, and other illegal activities, and to protect the rights, property, and safety of our business, our users, and the public.
- **Legal and Regulatory Compliance:** To comply with applicable federal and state laws, regulations, court orders, subpoenas, regulatory inquiries, and legal obligations, including those imposed by state insurance departments and federal agencies.
- **Actuarial and Underwriting Purposes:** To support actuarial analysis, risk assessment, and underwriting functions, including sharing relevant health and demographic information with insurance carriers, reinsurers, and MIB Group as required for these purposes.

- **Internal Business Operations:** To maintain records, conduct internal audits, support financial reporting, and perform other necessary business functions.

4. TCPA CONSENT & COMMUNICATIONS DISCLOSURE

Important: Telephone Consumer Protection Act Disclosure

Please read this section carefully before submitting your telephone number or any contact form on this Site.

4.1 Express Written Consent. By submitting your telephone number through any form on this Site—including but not limited to quote request forms, contact forms, callback request forms, or any other lead submission form—you expressly consent, in writing, to be contacted by us and our authorized partners, affiliates, insurance carriers, and lead generation partners at the telephone number(s) you provide. Such contact may be made via:

- Telephone calls, including calls placed using an automated telephone dialing system (ATDS) or predictive dialer;
- Prerecorded voice messages or artificial voice messages;
- SMS/text messages, including those sent using automated technology;
- Ringless voicemail, where permitted by applicable law.

Such communications may be made for marketing, informational, and transactional purposes related to life insurance products, services, and quotes.

YOUR CONSENT IS NOT A CONDITION OF PURCHASING ANY INSURANCE PRODUCT OR SERVICE. You are not required to provide this consent in order to obtain

a life insurance quote or to purchase any insurance policy. Alternative means of obtaining quotes or information are available by contacting us directly.

4.2 Message Frequency. Message frequency may vary depending on your interactions with us and the nature of your inquiry or policy. You may receive multiple messages per week, particularly during an active quote or application process.

4.3 Message and Data Rates. Message and data rates may apply. You are responsible for any fees charged by your mobile carrier for sending or receiving text messages. We are not responsible for any charges imposed by your wireless service provider.

4.4 How to Opt Out. You may revoke your consent to receive text messages at any time by replying **STOP** to any text message you receive from us. You may also opt out of telephone calls or other communications by contacting us directly at the contact information provided in Section 15 of this Policy, or by any other reasonable means by which you communicate your desire to opt out. Following your opt-out request, we will endeavor to honor your request within a commercially reasonable time, which shall not exceed ten (10) business days for text message opt-outs. Please note that even after opting out of marketing communications, we may still contact you regarding transactional or legally required communications related to an active insurance policy or application.

4.5 Call Recording. Telephone calls with our representatives may be recorded for quality assurance, training, compliance, and dispute resolution purposes. By engaging in a telephone call with us, you consent to such recording to the extent permitted by applicable law. Where applicable law requires the consent of all parties to a recorded call, we will provide notice of recording at the outset of the call.

4.6 Revocation of Consent. You have the right to revoke your TCPA consent at any time through any reasonable means. Revocation will be effective prospectively and will not affect the lawfulness of any communications made prior to revocation.

4.7 FCC One-to-One Consent Compliance. We are committed to compliance with the Federal Communications Commission's updated one-to-one consent standard, as adopted and in effect as of the date of this Policy. Accordingly, your consent to receive calls and texts is specific to our company and our authorized partners disclosed at the point of consent, and we will not share or transfer your TCPA consent to unrelated third parties for their independent telemarketing purposes beyond what is disclosed to you at the time of collection.

5. HIPAA-RELATED DISCLAIMER

5.1 Nature of This Business. This website is operated by a life insurance agency. **We are not a "covered entity" under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") in the traditional healthcare provider or health plan sense.** As an insurance agency, we are not a healthcare provider, health plan, or healthcare clearinghouse, and our primary operations are not governed by HIPAA's Privacy Rule or Security Rule as they apply to covered entities.

5.2 Health Information Collected for Insurance Purposes. Notwithstanding the foregoing, we do collect health-related information from you during the quoting and application process. This information—including medical history, prescription records, height, weight, tobacco use, and related health data—is collected solely for the purpose of obtaining life insurance quotes and facilitating the underwriting of life insurance policies. This information may be transmitted to and shared with life insurance carriers, reinsurers, and MIB Group, each of whom may be subject to applicable HIPAA requirements and state insurance privacy regulations in their own capacities.

5.3 Protection of Health Information. Although we may not be directly subject to HIPAA as a covered entity, we treat health-related information submitted through this Site with the highest level of care and confidentiality, including:

- Transmission of health data using TLS/SSL encryption;
- Storage of health data using AES-256 encryption or equivalent standards;
- Strict access controls limiting access to health information to employees and contractors with a legitimate need to know;
- Contractual confidentiality obligations with all carriers and service providers who receive health information.

5.4 MIB Group Notice. As part of the life insurance underwriting process, information about you may be submitted to MIB Group, Inc. MIB is a membership organization of life insurance companies that operates an information exchange on behalf of its member companies. If you apply for life, health, or disability income insurance coverage with a member company, MIB Group may provide such member company with information it may have in its files relevant to your insurability. Upon request, MIB will arrange for disclosure of any information in your file. If you question the accuracy of information in MIB's file, you may contact MIB and seek a correction. MIB's information may be used by life insurance companies to check for discrepancies in applications submitted to them. The address of MIB's information office is: MIB Group, Inc., 50 Braintree Hill Park, Suite 400, Braintree, MA 02184. Telephone: (866) 692-6901.

5.5 No Medical Advice. Nothing on this Site constitutes medical advice. The Site is provided for informational and insurance-related purposes only. No information provided through this Site should be interpreted as professional medical advice, diagnosis, or treatment. Always consult a qualified healthcare professional for medical concerns.

6. GRAMM-LEACH-BLILEY ACT (GLBA) – FINANCIAL PRIVACY NOTICE

6.1 Financial Institution Status. We are a financial institution within the meaning of the Gramm-Leach-Bliley Act, 15 U.S.C. § 6801 et seq. ("GLBA"). As such, we are required to provide you with a notice of our privacy practices with respect to nonpublic personal

information ("NPI") that we collect about you in connection with providing you financial products or services, including life insurance.

6.2 Categories of NPI We Collect. In the course of providing our services, we collect the following categories of NPI about you:

- Information you provide on applications, forms, and surveys (e.g., name, address, SSN, date of birth, income, health information);
- Information about your transactions with us and our affiliates (e.g., policy information, premium payments, application status);
- Information from third parties, such as credit reporting agencies, MIB Group, and other consumer reporting agencies.

6.3 Categories of NPI We Disclose. We may disclose NPI to third parties under the following circumstances:

- **To Process Transactions:** We share NPI with insurance carriers, reinsurers, and service providers necessary to process your insurance application and service your policy. This sharing cannot be opted out of, as it is necessary to provide you with the services you have requested.
- **Joint Marketing with Financial Companies:** We may share NPI with financial companies with whom we have joint marketing agreements, such as other insurance agencies or financial services companies. You may have the right to opt out of this sharing as described below.
- **Required by Law:** We may disclose NPI as required by federal or state law, including disclosure to regulators and law enforcement agencies. This sharing cannot be opted out of.
- **To Affiliated Companies:** We may share NPI with affiliated companies that offer financial products and services. You may have the right to opt out of certain such sharing.

6.4 Your Right to Opt Out. To the extent that applicable GLBA regulations provide you the right to opt out of certain third-party sharing of your NPI, you may exercise that right by contacting us at:

Ricardo Comaduran Independent Life Insurance Agent

Attn: Privacy Opt-Out Request

2015 Hancock St #121 San Diego California 92110

Email: *rick@rickcomaduran.com*

Phone: *800-682-1413*

Please note that even if you opt out, we may still share your NPI where legally permitted or required, including to process your transactions, prevent fraud, and comply with applicable law.

6.5 Security Safeguards. We maintain administrative, technical, and physical safeguards designed to protect your NPI from unauthorized access, use, or disclosure, consistent with applicable GLBA Safeguards Rule requirements. These safeguards are described in greater detail in Section 10 of this Policy.

7. COOKIE POLICY & TRACKING TECHNOLOGIES

This Section describes the cookies and similar tracking technologies we use on the Site, and your choices with respect to those technologies.

7.1 Types of Cookies We Use

We use the following categories of cookies and similar technologies:

- **Strictly Necessary Cookies:** These cookies are essential for the Site to function properly. They enable core features such as session management, security, fraud

prevention, and navigation. Without these cookies, certain portions of the Site cannot function. These cookies do not require your consent under most regulatory frameworks.

- **Functional / Preference Cookies:** These cookies enable the Site to remember your choices and preferences, such as your language preference, previously entered information, and other settings designed to enhance your experience. Disabling these cookies may affect certain personalized features.
- **Analytics Cookies:** These cookies collect information about how visitors use the Site, such as which pages are visited most often, how users navigate between pages, and whether they receive error messages. This information is used in aggregate form to improve the Site. We use analytics services including Google Analytics and similar platforms. See Section 7.2 for more information.
- **Marketing / Advertising Cookies:** These cookies are used to deliver advertisements relevant to you and your interests, limit the number of times you see an advertisement, and measure the effectiveness of advertising campaigns. They may be set by us or by third-party advertising networks with whom we work. They track your browsing activity across websites to build a profile of your interests. These cookies require your consent where mandated by applicable law.

7.2 Third-Party Cookies and Technologies

We permit certain third parties to place cookies or similar tracking technologies on the Site, including:

- **Google Analytics:** Used to collect and analyze website usage data in aggregate form. Google's data practices are governed by Google's Privacy Policy, available at [google.com/policies/privacy](https://www.google.com/policies/privacy).
- **Meta Pixel (Facebook Pixel):** Used to measure the effectiveness of advertising on Meta platforms and to deliver targeted advertisements to users who have previously visited our Site. Meta's data practices are governed by Meta's Data Policy.

- **Other Third-Party Analytics and Advertising Platforms:** We may use heatmapping tools, session recording tools, and other analytics platforms that operate under their own privacy policies.

We do not control the data practices of these third-party platforms. We encourage you to review their respective privacy policies to understand how they handle your information.

7.3 Managing Cookies

You may control and manage cookies through the following mechanisms:

- **Browser Settings:** Most web browsers allow you to refuse or delete cookies through their settings. The procedure varies by browser; please consult your browser's help documentation for specific instructions. Common browsers that allow cookie management include Chrome, Firefox, Safari, and Edge.
- **Cookie Preference Center:** *[Link to Cookie Preference Center / Cookie Consent Manager]* — where applicable, we provide a Cookie Preference Center through which you may adjust your cookie preferences by category.
- **Third-Party Opt-Out Tools:** For interest-based advertising opt-outs, you may use the tools provided by the Digital Advertising Alliance (optout.aboutads.info) or the Network Advertising Initiative (optout.networkadvertising.org).

Please note that disabling strictly necessary cookies may impair the functionality of the Site, and disabling analytics or advertising cookies may result in less relevant advertising but will not prevent advertising altogether.

7.4 Do Not Track Signals

Some browsers transmit "Do Not Track" (DNT) signals to websites. **This Site does not currently respond to Do Not Track browser signals**, as there is no universally accepted standard for how websites should respond to such signals. However, to the extent that applicable law requires us to honor opt-out preference signals—including Global Privacy Control (GPC) signals—we will do so in jurisdictions where such requirements are in effect, such as California under the California Privacy Rights Act ("CPRA").

8. THIRD-PARTY DATA SHARING & DISCLOSURE

We do not sell, rent, or trade your personal information except as described in this Policy. We may share your personal information with third parties in the following circumstances:

8.1 Insurance Carriers & Underwriters

We share personal information, including health information and identifying information, with life insurance carriers and reinsurers to whom we submit your application for the purpose of obtaining a life insurance quote, processing your application, and facilitating underwriting decisions. This sharing is necessary to provide you with the services you have requested and cannot be opted out of without forgoing the requested services.

8.2 MIB Group

As part of the underwriting process, we and participating insurance carriers may share information with, and receive information from, MIB Group, Inc. for the purpose of assessing insurability, detecting fraud, and verifying information contained in insurance applications. See Section 5.4 and Section 16 for additional information about MIB Group disclosures.

8.3 Service Providers & Vendors

We engage third-party service providers and vendors to perform services on our behalf, including web hosting, cloud storage, IT support, customer relationship management (CRM) systems, email marketing platforms, payment processing, analytics, and legal and compliance services. These service providers access personal information only to the extent necessary to perform their designated functions and are contractually obligated to maintain the confidentiality and security of your information through data processing agreements. They are not permitted to use your information for their own independent purposes.

8.4 Lead Generation & Affiliate Partners

We may share your contact information and expressed insurance interest with lead generation companies, affiliate marketing partners, and insurance distribution networks for the purpose of presenting you with life insurance products and services that may be of

interest to you. By submitting your information through this Site, you consent to the sharing of your information with such partners for insurance-related marketing purposes, subject to their own privacy policies. This consent is separate from, and in addition to, any TCPA consent you provide under Section 4.

8.5 Legal, Regulatory, and Law Enforcement Disclosures

We may disclose personal information when we believe in good faith that disclosure is necessary to: (a) comply with applicable law, regulation, court order, subpoena, or other legal process; (b) respond to requests from government or regulatory authorities, including state insurance departments and the Federal Trade Commission; (c) enforce our Terms of Use or other agreements; (d) protect the rights, property, or safety of our business, employees, users, or the public; or (e) detect, investigate, or prevent fraud or illegal activity.

8.6 Business Transfers

In the event of a merger, acquisition, consolidation, restructuring, sale of all or substantially all of our assets, or other corporate transaction, personal information we hold may be among the assets transferred to the acquiring entity. We will provide notice of such a transfer on this Site if it results in a material change to this Privacy Policy. The successor entity will be bound by this Policy or a materially equivalent policy with respect to previously collected information.

8.7 No Sale of Personal Information

We do not "sell" personal information as that term is defined under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA/CPRA"). We also do not "share" personal information for purposes of cross-context behavioral advertising, except as disclosed in this Policy and where required opt-out mechanisms are provided. If our practices in this regard change, we will update this Policy accordingly and provide required notices.

9. DATA RETENTION

9.1 General Retention Policy. We retain personal information for as long as necessary to fulfill the purposes for which it was collected, to maintain our business relationship with you, and to comply with our legal obligations. For insurance records, this generally means retaining information for the duration of your policy plus an additional period following termination of the policy, consistent with applicable state insurance regulations. Many states require insurance companies and agents to retain policyholder records for a minimum of **seven (7) years** from the date of policy termination or last transaction, and we adhere to such requirements as applicable.

9.2 Marketing Data. Personal information used exclusively for marketing purposes is retained for a shorter period, consistent with industry best practices and the basis upon which consent was obtained. Marketing communications opt-out records are retained indefinitely to document compliance with opt-out requests.

9.3 Website Analytics Data. Automatically collected website usage data and analytics data is generally retained for a period of twenty-six (26) months or less, in accordance with the retention settings established in our analytics platforms.

9.4 Requests for Deletion. You may request deletion of your personal information as described in Section 11 of this Policy. Please be aware that we may be unable to delete all of your information if retention is required by applicable law, necessary to complete a transaction you requested, necessary to detect fraud or security incidents, necessary to exercise or defend legal claims, or otherwise permitted or required under applicable law.

10. SECURITY MEASURES

10.1 Technical Safeguards. We implement industry-standard technical security measures to protect your personal information from unauthorized access, use, disclosure, alteration, or destruction, including:

- **Encryption in Transit:** All data transmitted between your browser and our servers is encrypted using Transport Layer Security (TLS) / Secure Sockets Layer (SSL) protocols.
- **Encryption at Rest:** Sensitive personal information stored in our systems is protected using AES-256 encryption or equivalent security standards.
- **Access Controls:** Access to personal information is restricted to authorized personnel on a need-to-know basis through role-based access control (RBAC) systems.
- **Multi-Factor Authentication (MFA):** Multi-factor authentication is required for internal systems and administrative access to data repositories containing personal information.
- **Firewalls and Intrusion Detection:** We maintain network firewalls, intrusion detection systems, and related security infrastructure to protect our systems.

10.2 Operational Safeguards. In addition to technical measures, we maintain operational and administrative safeguards, including:

- **Security Audits and Vulnerability Assessments:** We conduct regular security audits and vulnerability assessments of our systems and third-party service providers.
- **Employee Training:** All employees and contractors with access to personal information receive privacy and security training appropriate to their roles.
- **Confidentiality Agreements:** Employees and contractors with access to personal information are required to sign confidentiality agreements.
- **Vendor Security:** We conduct due diligence on third-party service providers and require contractual security commitments through data processing agreements.

10.3 Incident Response and Breach Notification. We maintain a written incident response plan designed to promptly detect, contain, and remediate security incidents affecting personal information. In the event of a security breach involving your personal information,

we will notify you and applicable regulatory authorities in accordance with applicable state data breach notification laws, which vary by state but generally require notification within a specified time period following discovery of a qualifying breach.

10.4 Limitation of Guarantee. While we take reasonable and appropriate steps to protect your personal information, no security system is impenetrable. We cannot guarantee the security of information transmitted over the internet or stored in our systems. You transmit information to us at your own risk.

11. YOUR PRIVACY RIGHTS

Depending on where you reside and the applicable law, you may have certain rights with respect to your personal information. These rights are described below.

11.1 California Residents (CCPA / CPRA)

If you are a resident of California, the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, "CCPA/CPRA"), provides you with specific rights regarding your personal information. These rights include:

- **Right to Know:** The right to request disclosure of the categories and specific pieces of personal information we have collected about you, the sources from which it was collected, the purposes for which it is used, and the categories of third parties with whom it is shared.
- **Right to Delete:** The right to request deletion of personal information we have collected from you, subject to certain exceptions permitted by law (such as information needed to complete a transaction or comply with a legal obligation).
- **Right to Correct:** The right to request correction of inaccurate personal information we maintain about you.

- **Right to Opt Out of Sale / Sharing:** The right to opt out of the "sale" of your personal information and the "sharing" of your personal information for cross-context behavioral advertising, as those terms are defined under the CCPA/CPRA. You may exercise this right by *[Link: Do Not Sell or Share My Personal Information]* or by contacting us as described below.
- **Right to Limit Use of Sensitive Personal Information:** The right to request that we limit our use and disclosure of your sensitive personal information (which includes Social Security Numbers, health information, and financial account information) to purposes permitted by the CCPA/CPRA.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising your privacy rights. We will not deny services, charge different prices, or provide a different level of service based solely on your exercise of rights under the CCPA/CPRA.

How to Submit a Verifiable Consumer Request: California residents may submit a request to exercise the above rights by:

- Email: *[Privacy Email Address]* (subject line: "California Privacy Request")
- Toll-Free Number: *[Toll-Free Phone Number]*

We will respond to verifiable consumer requests within forty-five (45) days of receipt. If we require additional time (up to an additional forty-five (45) days), we will notify you of the extension within the initial forty-five (45) day period and explain the reason for the extension.

Authorized Agent: You may designate an authorized agent to submit a request on your behalf. To do so, you must provide the authorized agent with written permission to submit requests on your behalf, and we may require verification of both your identity and the agent's authority before processing the request.

Shine the Light (Cal. Civ. Code § 1798.83): California residents may also request, once per calendar year, information about the categories of personal information (if any) we disclosed

to third parties for direct marketing purposes during the preceding calendar year, and the names and addresses of those third parties. To make such a request, contact us at *[Privacy Email Address]* with "Shine the Light Request" in the subject line.

11.2 Virginia, Colorado, Connecticut, and Texas Residents

Residents of Virginia (Virginia Consumer Data Protection Act, "VCDPA"), Colorado (Colorado Privacy Act, "CPA"), Connecticut (Connecticut Data Privacy Act, "CTDPA"), and Texas (Texas Data Privacy and Security Act, "TDPSA") have similar privacy rights under their respective state laws, including:

- **Right of Access:** To confirm whether we are processing your personal data and to access that data.
- **Right to Delete:** To request deletion of personal data you have provided to us, subject to applicable exceptions.
- **Right to Correct:** To request correction of inaccurate personal data.
- **Right to Data Portability:** To obtain a portable copy of personal data you have provided to us, in a commonly used format.
- **Right to Opt Out:** To opt out of the processing of your personal data for purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects.
- **Right to Appeal:** If we decline to act on your request, you have the right to appeal our decision. Instructions for submitting an appeal will be provided at the time of any such denial.

To exercise any of the above rights, please contact us using the information in Section 15. We will respond within the timeframes required by your applicable state law.

11.3 Nevada Residents

Nevada residents have the right to opt out of the sale of "covered information" as defined under Nevada Revised Statutes Chapter 603A. Although we do not currently "sell" covered information as defined under Nevada law, if you wish to submit an opt-out request for future

changes in our practices, you may do so by contacting us at *[Privacy Email Address]* with "Nevada Opt-Out Request" in the subject line.

11.4 Rights Available to All Users

Regardless of your state of residence, all users of this Site have the following rights:

- **Right to Opt Out of Marketing Communications:** You may opt out of receiving promotional emails or text messages from us at any time by following the unsubscribe instructions in any marketing email, by replying STOP to any marketing text message, or by contacting us directly.
- **Right to Correct Inaccurate Information:** If you believe that personal information we hold about you is inaccurate, you may contact us to request a correction.
- **Right to Access a Summary of Your Data:** You may contact us to request a summary description of the categories of personal information we maintain about you.
- **How to Exercise Your Rights:** Contact us at *[Privacy Email Address]* and include "Privacy Rights Request" in the subject line. We may need to verify your identity before processing your request.

12. CHILDREN'S PRIVACY (COPPA)

12.1 Not Directed to Children. This Site is not directed to, and is not intended for use by, individuals under the age of thirteen (13). We do not knowingly collect, solicit, or maintain personal information from children under the age of 13. Life insurance products are intended for adult consumers, and we do not target or market our services to minors.

12.2 Inadvertent Collection. If you are a parent or legal guardian and you believe that your child under the age of 13 has submitted personal information to us through this Site without your consent, please contact us immediately at *[Privacy Email Address]*. Upon verification,

we will take reasonable steps to delete the child's information from our records as promptly as practicable, subject to any legal obligations that may require its retention.

12.3 Compliance. Our practices with respect to the collection of children's information are governed by the Children's Online Privacy Protection Act ("COPPA"), 15 U.S.C. § 6501 et seq., and the FTC's implementing regulations thereunder.

13. LINKS TO THIRD-PARTY WEBSITES

13.1 Third-Party Links. This Site may contain hyperlinks to websites operated by third parties, including insurance carriers, industry organizations, government agencies, and other businesses. These links are provided for your convenience and reference only. We do not control, endorse, or assume responsibility for the content, privacy practices, or security of any third-party websites.

13.2 Independent Privacy Practices. When you navigate away from our Site to a third-party website, this Privacy Policy no longer applies. We strongly encourage you to review the privacy policy and terms of use of any third-party website you visit before submitting any personal information to that site. Your interactions with third-party websites are subject to those third parties' terms and privacy practices, not ours.

14. CHANGES TO THIS PRIVACY POLICY

14.1 Right to Update. We reserve the right to modify, update, or replace this Privacy Policy at any time, at our sole discretion, to reflect changes in applicable law, regulatory requirements, our business practices, or the types of information we collect or use. The "Last Updated" date at the top of this Policy will be revised to indicate the date of the most recent changes.

14.2 Notification of Material Changes. If we make changes to this Policy that we consider material—meaning they significantly affect your rights or the way we collect and use your personal information—we will notify you by posting a prominent notice on the Site's homepage and/or by sending an email notice to the email address associated with your account or inquiry, where applicable. We encourage you to review this Policy periodically.

14.3 Acceptance of Changes. Your continued use of the Site following the posting of any updated Privacy Policy constitutes your acceptance of the revised Policy. If you do not agree to the updated terms, you should discontinue your use of the Site and contact us to exercise any applicable rights you may have with respect to your personal information.

15. CONTACT US / PRIVACY INQUIRIES

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact our Privacy team using the information below. We will make reasonable efforts to respond to all inquiries in a timely manner.

Company Name: *[Company Legal Name]*

Mailing Address: *[Street Address, City, State, ZIP Code]*

Email Address: *[privacy@yourcompany.com]*

Phone Number: *[Toll-Free: 1-800-XXX-XXXX]*

Hours of Operation: *[Monday–Friday, 9:00 AM – 5:00 PM, Central Time]*

When contacting us regarding a privacy matter, please include "**Privacy Request**" in the subject line of your email or correspondence to ensure prompt routing to the appropriate team member.

Legal Notice

This Privacy Policy does not constitute legal advice. Privacy and data protection law is complex, jurisdiction-specific, and subject to frequent change. If you have legal questions regarding your rights under applicable law, or if you are a business seeking legal guidance regarding your own compliance obligations, you are strongly advised to consult with a licensed attorney qualified in privacy and data protection law in your jurisdiction.

16. ADDITIONAL DISCLOSURES FOR INSURANCE APPLICANTS

16.1 Fair Credit Reporting Act (FCRA) Disclosure. In connection with your application for life insurance, we and/or the insurance carriers to whom your application is submitted may obtain consumer reports and investigative consumer reports from consumer reporting agencies. The Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 et seq., provides you with important rights regarding these reports, including:

- **Right to Disclosure:** If your application is declined, your premium is increased, or other adverse action is taken based in whole or in part on information in a consumer report, you will be notified of this adverse action. Upon such notification, you have the right to obtain a free copy of the consumer report from the consumer reporting agency that furnished the report within sixty (60) days of the adverse action notice.
- **Right to Dispute:** You have the right to dispute the accuracy or completeness of any information in your consumer report directly with the consumer reporting agency. Consumer reporting agencies are required to investigate disputes and correct inaccurate or unverifiable information.

- **Right to Know:** You have the right to know what information consumer reporting agencies have on file about you. You may request your consumer report from MIB Group and other consumer reporting agencies as described in Section 16.2 below.

16.2 MIB Group — Applicant Disclosure. As part of the life insurance underwriting process, information related to your insurability may be submitted to and received from MIB Group, Inc., in accordance with your signed authorization on the insurance application. This is a standard practice in the life insurance industry. You are entitled to the following rights with respect to MIB:

- You may request disclosure of any information MIB may have in its files pertaining to you by contacting MIB Group at the address or telephone number provided in Section 5.4 of this Policy.
- If you believe the information in MIB's file is inaccurate, you may contact MIB to dispute the accuracy of that information.
- Information in MIB's file may be used by other MIB member insurance companies when you apply for life, health, or disability income insurance coverage.

16.3 State Insurance Department Contact. If you have a complaint or inquiry regarding our privacy practices in connection with your insurance application or policy, you may also contact the insurance regulatory authority in your state. The appropriate contact information for your state insurance department can be found through the National Association of Insurance Commissioners (NAIC) at naic.org or by contacting: *[State Insurance Department Name, Address, Telephone Number]*.

16.4 Investigative Consumer Reports. In some cases, an investigative consumer report may be obtained, which includes information about your character, general reputation, personal characteristics, and mode of living gathered through personal interviews with your neighbors, friends, or associates. If an investigative consumer report is ordered, you will be notified separately and provided with the disclosures required under applicable federal and state law, including your right to request a written summary of the nature and scope of the investigation.

ATTORNEY REVIEW DISCLAIMER: This Privacy Policy was prepared for general informational and illustrative purposes only. It is intended to provide a framework for a life insurance agency's privacy disclosures and does not constitute legal advice. Laws and regulations governing privacy, data protection, insurance, telecommunications, and consumer rights vary by jurisdiction and are subject to change. **It is strongly recommended that you consult with a licensed attorney experienced in privacy law, insurance regulatory compliance, and applicable federal and state law to ensure that your Privacy Policy is complete, accurate, and legally compliant before publishing it on any website or distributing it to consumers.**

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