

Independence Pet Privacy Notice

IMPORTANT PRIVACY NOTICE REGARDING YOUR NONPUBLIC PERSONAL INFORMATION

Independence Pet Holdings, Inc., together with its affiliates and subsidiaries (collectively referred to as “Company”, “we”, “us” or “our”) respect your privacy and are committed to protecting your personal information from unauthorized access and use through our compliance with this policy.

This policy describes the personal information that we may collect from you, or that you may provide on any website of Company and affiliates, and how that information may be used or disclosed by the Company.

This policy does not apply to information we collect through any other means, or to information collected on any other company, its affiliate or third-party site or by any third-party application that may be linked to or be accessible from the website.

Please read the following carefully to understand our policies and practices regarding your personal information and how we will treat it. By using or accessing our website, you agree to this privacy policy. This policy may change from time to time and your continued use of the website is deemed to be acceptance of such changes, so please check the policy periodically for updates.

Information Collected

We collect personal information (for example, name, address, email address) when you voluntarily provide it to us or when you navigate through the sites or mobile application, including usage details, IP addresses, cookies and web beacons. Only your domain is recognized when you visit our websites; your individual e-mail address is not. We may collect personal information from third parties such as our business partners. We do not sell or rent information about our customers to others.

Sources of Your Information

We may collect information from the following sources:

- Information we collect through our websites and mobile application, which includes, but is not limited to, usage details, IPA addresses, cookies, web beacons, web and mobile bugs, mobile device identifiers,
- Information that you provide on quote requests or applications or other forms which may require some or all of the following: your name, address, email address, telephone number and other information that may be required to assist in performing your request.
- Information from your transactions with us, our affiliated companies, or our business partners. This includes products and services you have purchased from us or information about your payment history or claims.
- Information that you provide when purchasing insurance, paying premiums, making changes to your policy, or filing a claim.
- Information we receive from third parties, such as non-PetPartners, Inc. owned business partners.
- Hotjar™ heat maps and recordings which shows the users point of interest through mouse movement or clicks.

Sharing Information

In order to conduct our business and offer you the products and services that you may want, we may share your information as allowed or required by law. We may share your information with our affiliates or third parties outside of the Company to service, market or underwrite our products and services to you. We may share your information with insurance agents and brokers who sell our products and services. We may also share your information with companies that we have formal agreements with to sell our products and services.

Working with these businesses allows us to provide you with a broader selection of insurance and investment products and services from our companies. These businesses sign a contract with us to keep your information private and secure and to use it only for the services we request. If any sharing of your information would require us to give you the option to opt-out of or opt-in to the information sharing, we will provide you with this option.

Pet Medical Information

We obtain or share your pet's medical information only in connection with specific products and services. This may include underwriting a pet insurance policy, processing a claim or any other use that we disclose to you before the information is collected. We have implemented measures designed to secure your pet's medical information from accidental loss and from unauthorized access, use, alteration and disclosure.

About Independent Insurance Agents and Brokers

The independent insurance agents and brokers who sell our products and services are not our employees and are not subject to our privacy policy. Contact your agent or broker to learn more about their privacy practices.

Keeping Your Personal Information Safe

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

Where we have given you (or where you have chosen) a password for access to certain parts of our website or mobile application, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Please note that the information you share in public areas of the website or mobile application, such as comments, may be viewed by any user of the website or mobile application.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website or mobile application. Any transmission of personal information is at your own risk.

Browsers & Security

In some instances we use Secure Socket Layer (SSL) encryption technology. SSL protects information as it crosses the Internet. You can tell if you are visiting a secure area by looking at the padlock symbol at the bottom of your browser screen. If it is "locked," you have a secure session.

Links to Other Sites

Our website contains links to other websites for informational or resource purposes. These other websites are not under our direct control, and they may collect information about you that we do not. We are not responsible for the privacy practices or the content of linked websites.

Accuracy of Your Information

If you need to update your information or if the information we have about you is inaccurate or incomplete, please contact us at:

Email: privacy@ipgpet.com

Mail: Attn: Privacy Officer
Independence Pet Holdings, Inc.
11333 North Scottsdale Road, Suite 160
Scottsdale, AZ 85254

Include your name, address, telephone number and policy number we have on file.

You can also request a copy of the information that we have about you in our files to make sure it is correct. You must make your request [over the phone at the above listed phone number or in writing and send it to the address shown on your policy or contract or to the email address or physical address shown above. Within 30 business days of receiving your request, we will send you the information. If required by federal or state statute or regulation, we will advise you of any person or group to whom we have given information about you.

Opting Out of Marketing

We may communicate promotions and special offers to you from time to time via email. If you would like to opt out of receiving promotional and special offer emails, notify us:

Email: privacy@ipgpet.com

Telephone: 1-866-774-1113 (Mon – Fri 8:30am-8pm EST, Sat 10am-3pm EST)

Please allow sufficient time for your request to be processed. It may take up to 10 days to process an email opt-out request, and 4-6 weeks for other requests.

Information Sharing

If you only browse our website and do not supply any information, you will not receive unsolicited email, telephone calls or other marketing materials from us as a result of your visit.

We may disclose personal information that you provide via this website or mobile application to the following third parties:

- Our subsidiaries and affiliates.
- Contractors and service providers we use to support our business.
- In the event of merger, acquisition, or any form of sale of some or all of our assets, in which case personal information held by us about our customers will be among the assets transferred to the buyer.

We may also disclose your personal information to third parties to:

- Comply with any court order or other legal obligation.
- Enforce or apply our Terms of Use.
- Protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Usage Details and IP Addresses

As you navigate through the website or mobile application, we may also collect details of your visit, including, but not limited to, traffic data, location data, logs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access, as well as information about your computer and internet connection, including your IP address, mobile device, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' equipment, browsing actions and patterns, and does not identify any individual.

Cookies

Our websites send cookies to your computer. A cookie is a small file stored on the hard drive of your computer. We use cookies to improve our websites, customize your user experience, speed up searches, and recognize when you return to our websites. Our cookies do not read data from your computer's hard drive or other websites' cookies. You may refuse to accept cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our websites.

Web Beacons

Pages of the websites may contain electronic images known as web beacons (also referred to as single-pixel gifs) that permit the Company to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). Web beacons are not used to access your personal information on the website and are only used to compile aggregated statistics concerning use of the website.

Third-Party Advertiser Use of Cookies and Web Beacons

Some advertisements are served by third-party advertising companies. Please note that our advertisers may also use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about our users. We do not have control over third-party advertisers' cookies or how they may be used. If you have any questions about an advertisement, you should contact the responsible advertiser directly.

We do not collect personally identifiable information automatically, but we may tie any information collected through cookies to information you may have previously submitted.

We also work with third-party internet advertising companies to direct behaviorally-targeted advertising to a variety of our website users. Network Advertising Initiative (NAI), an independent entity, offers you the option to opt out from participating in behavioral targeted advertising by visiting their page: http://www.networkadvertising.org/managing/opt_out.asp. By opting out, you will stop receiving behavioral target ads from your visits to this website, but this does not mean you will be served any non-behavioral ads, nor does opting out stop information from being collected.

User Contributions

You are responsible for any content, including personal information, that you contribute to be published or displayed (hereinafter, "posted") on the website or mobile application, or transmit to other users of the website or mobile application (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to other users of the website and mobile application at your own risk. Although we may limit access to certain pages and you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the websites or mobile application with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. We are not responsible for circumvention of any privacy settings or security measures contained on the website and mobile application. You understand and acknowledge that,

even after removal, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other users. Proper access and use of information provided on the website and mobile application, including User Contributions, is governed by our Terms of Use and known or suspected violations should be reported to:

Telephone: 1-866-774-1113 (Mon – Fri 8:30am-8pm EST, Sat 10am-3pm EST)

Protecting Children

Our website and mobile application are not directed toward children under the age of 13. We do not knowingly collect or use personal information from children under 13. If you are a parent or legal guardian and have reason to believe that any of your children has provided us with personal information without your consent, please contact us and we will take steps to delete the information.

California Consumer Privacy Rights

CCPA Rights

What May I Request?

- **Right to Know.** You can request that we disclose to you: (i) the categories and/or specific pieces of personal information we have collected about you, (ii) the categories of sources for that personal information, (iii) the purposes for which we will use that information, (iv) the categories of any third parties with whom we may disclose that information, and (v) the categories of information that we may disclose to any third parties. We will provide you this information for the 12-month period preceding your request. You can make a request to know twice a year.
- **Right to Deletion.** You can request that we delete your personal information and ask that our service providers to do the same. We will honor the request to delete unless one of the following exceptions applies:
 - **Transactional:** information that is necessary to complete a transaction or contract for which it was collected.
 - **Security:** to detect, prevent, or investigate security incidents.
 - **Error Correction:** to identify and repair any errors or bugs.
 - **Non-identifying information:** To help diagnose problems and administer our site, information such as your IP address, browser type, and operating system may be gathered, but do not identify any individual.
 - **Legal:** to comply with applicable laws or legal obligations, to protect against fraud or illegal activity, or to ensure the right of a consumer to exercise rights, such as free speech rights.
 - **Internal Use:** to use in a lawful manner that is reasonably aligned with the expectations of the consumer and the context in which the consumer provided the information (i.e., improve our services).
- **Right to Opt Out of Sales or Sharing.** We do not sell your information. You may opt out of us sharing your information by submitting a request.
- **Right to Nondiscrimination.** We will not discriminate against you and we will not charge you a different price or provide a different level of service for exercising your CCPA rights. We will not discriminate against you for exercising any of your CCPA rights and we will not deny you goods or services, charge you a different price, or provide you with a lesser quality of goods or services if you exercise any of your CCPA Rights.

- Right to Correct Inaccurate Personal Information. You can request correction of any inaccurate personal information we have about you.
- Right to Limit. Upon your direction, we will limit the use and disclosure of sensitive personal information collected about you, such as only using this information to provide you with the services you requested.

Please be aware that most of the information we collect may be governed by other laws and not the CCPA, such as the Gramm-Leach Bliley Act (“GLBA”).

May I Use an Authorized Agent?

If you wish to designate an authorized agent to act on your behalf, you must provide the authorized agent with written permission to do so, and your authorized agent must submit that written proof at the time they make the request on your behalf.

May I Make Multiple Requests?

If you wish to make multiple requests under this section, we recommend sending the deletion request last, as we will not be able to fulfill your other requests once we have deleted your information.

How Long Will It Take to Process My Request?

For verifiable consumer requests related to opting out of the sharing of data, we will respond within fifteen (15) days of receiving the request.

For all other requests, we will respond to a verifiable consumer request within forty-five (45) calendar days of receipt. If necessary, we may require an additional forty-five (45) calendar days, at which point we would inform you of the reason and extension period in writing. We will provide an explanation in the event we are unable to process a request in whole or in part.

What Do I Need to Provide When Making a Request?

In order to verify your identity when you are making a request, you may need to provide the following information if applicable:

- Name
- Telephone number
- Mailing address
- Email address

We will match this information to the information in our systems and under certain circumstances may request additional information via email or telephone to ensure we are interacting with the correct individual. We will maintain a record of your request.

Please be aware that we do not accept or process requests through other means (e.g., via fax, chats, social media, etc.).

How May I Make a Request?

You may make a request using one of the methods below:

- Email us at privacy@ipgpet.com
- Sending us a request via mail to:
Attn: Privacy Officer
Independence Pet Holdings, Inc.
11333 North Scottsdale Road, Suite 160
Scottsdale, AZ 85254

Changes to Our Privacy Policy

If we decide to make any changes to our privacy policy, those changes will go into effect on the effective date posted in the notice at the top of the revised privacy policy. The most current version of the privacy policy will apply to all current and past visitors of our websites and will replace any prior policies that are inconsistent. Your continued use of our websites and other services constitutes your acceptance of the practices described in the most current privacy policy.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us:

Email: privacy@ipgpet.com

Telephone: 1-866-774-1113 (Mon – Fri 8:30am-8pm EST, Sat 10am-3pm EST)