



## CSE Insurance Group California Supplemental Privacy Notice

**Last Updated:** [1/1/2020]

CSE Insurance Group respects the privacy concerns of our customers, our claimants, and the visitors to our websites at CSEInsurance.com and QuoteCSE.com (such website visitors, the “**Website Visitors**”, and such websites, the “**CSE Insurance Websites**”). This California Supplemental Privacy Notice (“**Supplemental Privacy Notice**”) describes our practices regarding any Insurance Information that we may receive from our individual customers and potential customers of our insurance products, any Claimant Information that we may receive in connection with our Claims Servicing, and any Website Information that we may receive from our Website Visitors (all as defined below).

CSE Insurance Group may collect or receive personal information from consumers in a variety of ways. First, CSE Insurance Group collects personal information from individual customers and potential customers of our personal insurance products. Second, CSE Insurance Group collects personal information from third party claimants in connection with administering the various insurance policies we have issued to our customers. Finally, CSE Insurance Group may collect limited personal information from our Website Visitors when they visit the CSE Insurance Group Websites. More information regarding the personal information collected from each of these methods is described below.

For purposes of this Supplemental Privacy Notice, personal information does not include publicly available information from government records, de-identified or aggregated information, or certain other regulated information, including information that is subject to the Gramm-Leach-Bliley Act (“**GLBA**”).

## **I. PERSONAL INFORMATION COLLECTED FROM INDIVIDUAL CUSTOMERS AND POTENTIAL CUSTOMERS**

CSE Insurance Group offers various personal insurance products and we collect personal information from individual customers and potential customers when they apply for and/or purchase insurance products from us, when we administer claims, and in connection with other insurance transactions (collectively, “**Insurance Information**”). We only collect and process Insurance Information in connection with our provision of our personal insurance products. Because all Insurance Information is subject to the GLBA, this Privacy Notice does not apply to any Insurance Information — rather, Insurance Information is subject to our Privacy Policy, available at ([www.mycsepolicy.com](http://www.mycsepolicy.com) > **click Privacy Policy**). If you are a customer or potential customer of an insurance product we offer, please consult our Privacy Policy for more information regarding how we collect, use and share your Insurance Information.

## **II. PERSONAL INFORMATION COLLECTED FROM CLAIMANTS**

CSE Insurance Group services claims for our customers in connection with the various insurance policies that we offer (“**Claims Servicing**”). In connection with our provision of the Claims Servicing, we may collect, and may have collected in the twelve (12) months prior to the date of this Supplemental Privacy Notice, certain personal information from claimants who are not our customers (such information, the “**Claimant Information**”, and such non-customer claimants, the “**Claimants**”), as described below. It is important to note that the types of personal information we collect will depend on each Claimant’s interaction with us.

Category of Personal Information Collected	Categories of Source(s) from which Personal Information is Collected	Business or Commercial Purpose(s) for which Personal Information is Collected or Used	Categories of Third Parties with whom Personal Information is Shared
<p><b>Contact Information</b>, such as name, address, email address and telephone number</p>	<ul style="list-style-type: none"> <li>• Directly from consumers or observation of consumers or their actions</li> <li>• Service Providers</li> <li>• Data Vendors</li> <li>• Third Party Product Providers</li> <li>• Government Entities</li> </ul>	<ul style="list-style-type: none"> <li>• Communicating with you and responding to your questions</li> <li>• Litigation and Claims Handling</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Data Vendors</li> <li>• Third Party Product Providers</li> <li>• Government Entities</li> </ul>
<p><b>Identification Information</b>, such as social security number, driver's license number, and other government issued identification numbers</p>	<ul style="list-style-type: none"> <li>• Directly from consumers or observation of consumers or their actions</li> <li>• Service Providers</li> <li>• Data Vendors</li> <li>• Third Party Product Providers</li> <li>• Government Entities</li> </ul>	<ul style="list-style-type: none"> <li>• Communicating with you and responding to your questions</li> <li>• Litigation and Claims Handling</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Data Vendors</li> <li>• Third Party Product Providers</li> <li>• Government Entities</li> </ul>
<p><b>Medical Information</b>, such as medical history, medical diagnoses, and test results</p>	<ul style="list-style-type: none"> <li>• Consumers or observation of consumers or their actions</li> <li>• Service Providers</li> <li>• Data Vendors</li> <li>• Third Party Product Providers</li> <li>• Government Entities</li> </ul>	<ul style="list-style-type: none"> <li>• Communicating with you and responding to your questions</li> <li>• Litigation and Claims Handling</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Data Vendors</li> <li>• Third Party Product Providers</li> <li>• Government Entities</li> </ul>

### III. PERSONAL INFORMATION COLLECTED FROM THE CSE INSURANCE GROUP WEBSITES

In connection with our provision of the CSE Insurance Group Websites, we may collect, and we may have collected in the twelve (12) months prior to the date of this Supplemental Privacy Notice, certain personal information from our Website Visitors when they visit or use the CSE Insurance Group Websites (such information, the “**Website Information**”), as described below. It is important to note that the types of personal information we collect will depend on each Website Visitor’s interaction with us.

Category of Personal Information Collected	Categories of Source(s) from which Personal Information is Collected	Business or Commercial Purpose(s) for which Personal Information is Collected or Used	Categories of Third Parties with whom Personal Information is Shared
<b>Contact Information</b> , such as name, address, email address and telephone number	From you providing this information directly on the CSE Insurance Group Websites (e.g., when you fill out a form to request information)	<ul style="list-style-type: none"> <li>• Communicating with you and responding to your questions</li> <li>• Providing you with the information, service or media that you requested</li> <li>• Marketing products and services offered by us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Entities</li> </ul>
<b>Demographic Information</b> , such as zip code and age	From you providing this information directly on the CSE Insurance Group Websites (e.g., when you complete surveys or participate in contests)	<ul style="list-style-type: none"> <li>• Communicating with you and responding to your questions</li> <li>• Providing you with the information, service or media that you requested</li> <li>• Marketing products and services offered by us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Entities</li> </ul>
<b>Survey Information</b> , such as responses to our survey questions	From you providing this information directly on the CSE Insurance Group Websites (e.g., when you complete surveys)	<ul style="list-style-type: none"> <li>• Communicating with you and responding to your questions</li> <li>• Providing you with the information, service or media that you requested</li> <li>• Marketing products and services offered by us</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Entities</li> </ul>

<b>Online Activity Information on the CSE Insurance Group Websites</b> , such as IP address, browser type, browser language, operating system, and pages viewed on the CSE Insurance Group Websites	From your use of the CSE Insurance Group Websites — this information is automatically collected when you visit the CSE Insurance Group Websites through the use of browser information and log files	<ul style="list-style-type: none"> <li>• Providing you with the CSE Insurance Websites</li> <li>• Improving the CSE Insurance Group Websites, including statistical analysis of the CSE Insurance Group Websites</li> <li>• For our IT or security purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Entities</li> </ul>
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**IV. ADDITIONAL PURPOSES FOR COLLECTION OR USE OF PERSONAL INFORMATION**

In addition to the uses described above, CSE Insurance Group may also use or share personal information:

- *to comply with applicable laws and regulatory requirements, or as requested by government or regulatory authorities or law enforcement*
- *with our attorneys, accountants and auditors*
- *in connection with pending litigation*
- *in connection with a merger, divestiture, acquisition, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred*
- *to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity*
- *to debug to identify and repair errors that impair existing intended functionality in the CSE Insurance Group Websites*

## V. NO SALE OF PERSONAL INFORMATION

CSE Insurance Group has not sold your personal information to third parties in the twelve (12) months prior to the date of this Supplemental Privacy Notice. In addition, CSE Insurance Group will not sell your personal information to third parties (including for their own direct marketing purposes). If you are entitled to any disclosure rights in your jurisdiction regarding our sale of your personal information to third parties or our disclosure of your personal information to third parties for their own direct marketing purposes, this disclosure satisfies those requirements. If we change our practices in the future for any new information that we collect from you, we will update this Supplemental Privacy Notice accordingly. If you still wish to learn more about our compliance with this requirement, please contact us using the information provided in the “Contact Us” section below.

## VI. CCPA RIGHTS FOR CALIFORNIA CONSUMERS

The California Consumer Privacy Act of 2018 (“**CCPA**”) provides California consumers with certain rights with regard to their personal information. This Section explains those rights. If you are a California consumer and would like to exercise any of those rights under the CCPA, please see Section VI.E below for more information on how to submit a request.

For purposes of this Supplemental Privacy Notice, a “**California consumer**” is a natural person who resides in California, and does not include persons to the extent they are (i) acting as an employee, owner, director, officer or contractor of a company, partnership, sole proprietorship, nonprofit or government agency that is doing business with CSE Insurance Group (which includes the independent insurance agents that offer our insurance products) or (ii) acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of CSE Insurance Group.

Note that the CCPA excludes from its scope any information that is subject to the GLBA. Accordingly, the rights described in this Section do not apply to any Insurance Information that we collect from our customers or potential customers — rather, the rights described in this Section only apply to Claimant Information and Website Information that we receive from California residents. If you are a customer or potential customer, please consult our Privacy Policy for more information regarding how we use your Insurance Information.

## **A. RIGHT TO KNOW ABOUT AND ACCESS YOUR PERSONAL INFORMATION**

If you are a California consumer, you may have the right to request that CSE Insurance Group provide you with information regarding what personal information about you we have collected, used, disclosed, or sold in the preceding twelve (12) months. Once we receive your request and verify your identity, we will disclose to you one or more of the following as requested:

- The categories of personal information we have collected about you in the preceding twelve (12) months.
- The categories of sources from which we collected your personal information in the preceding twelve (12) months.
- The business or commercial purposes for collecting your personal information in the preceding twelve (12) months.
- The categories of third parties with whom we shared your personal information in the preceding twelve (12) months.
- The specific pieces of personal information we collected about you in the preceding twelve (12) months.

## **B. RIGHT TO DELETE YOUR PERSONAL INFORMATION**

If you are a California consumer, you may have the right to request that CSE Insurance Group delete certain of your personal information that we have collected from you. However, this right to deletion does not apply to any of your personal information that is subject to an exception under the CCPA (as described below). Once we receive your request and verify your identity, we will delete (and direct our service providers to delete) your personal information in our records that is not subject to any of the CCPA exceptions.

### CCPA Exceptions

We may deny your deletion request where your personal information is required for any of the following reasons, which we will identify in our response to you if we deny your request:

- Complete the transaction for which we collected the personal information, provide a product or service that you requested (e.g., insurance product), take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.

- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **C. RIGHT TO OPT-OUT OF THE SALE OF YOUR PERSONAL INFORMATION**

As indicated in Section V above, we have not sold personal information about you to third parties in the twelve (12) months prior to the date of this Supplemental Privacy Notice, and will not sell personal information about you without further notice. If we change our practices in the future for any new information that we collect from you, we will notify you by updating this Supplemental Privacy Notice.

### **D. RIGHT TO NON-DISCRIMINATION**

CSE Insurance Group will not discriminate against any California consumer who exercises any of the rights described above. Specifically, except as permitted by the CCPA, we will not deny you goods or services; charge you different prices or rates, including through granting discounts or other benefits, or imposing penalties; provide you with a different level of service or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **E. HOW TO SUBMIT A REQUEST**

If you are a California consumer and would like to exercise any of the CCPA rights identified above, you may submit a request by either emailing us at [customersupport@cseinsurance.com](mailto:customersupport@cseinsurance.com) or by calling us at 1-800-282-6848.

## **F. SUBMITTING A REQUEST THROUGH YOUR AUTHORIZED AGENT**

If you are a California consumer, you may have the option to designate an authorized agent to submit a request on your behalf, so long the authorized agent has your written permission to do so and you have taken steps to verify your identity directly with us. If you would like to designate an agent, your agent must register as such with the California Secretary of State and submit a copy of this registration along with your consumer request to us. We may need to contact you directly to verify the request.

## **G. HOW WE VERIFY YOUR REQUEST**

To process your request for access or deletion, we must be able to verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us.

To verify your identity, we will ask that you provide the following information when you submit your request:

- your contact information
- an additional identifier depending on your relationship with us

Depending on your type of request or the information requested by you, we may require additional information in order to verify your identity and fulfill your request. If we cannot successfully verify your identity, we will inform you of that fact.

We will respond to your request within forty-five (45) days. However, in certain circumstances, we may require additional time to process your request, as permitted by the CCPA or other applicable law. We will advise you within forty-five (45) days after receiving your request if such an extension is necessary and why it is needed. Any disclosures we provide will only cover the twelve (12)-month period preceding our receipt of your request. If we cannot fulfill your request, our response to you will also explain the reason why we cannot fulfill your request.

## **VII. TRACKING**

Certain web browsers may provide a do-not-track (“DNT”) option, where you may be able to set your browser to inform websites that you do not wish your activities to be tracked. The CSE Insurance Group Websites do not engage any third parties that collect personal information about an individual consumer’s online activities over time and across different websites when the consumer uses the CSE Insurance Group Websites. Accordingly, the CSE Insurance Group Websites currently do not respond to DNT signals.

## **VIII. ANALYTICS PROVIDER**

We work with a third party analytics service provider, Google Analytics, to help us better understand how our Website Visitors use the CSE Insurance Group Websites and to help us improve the CSE Insurance Group Websites. To provide this service, Google Analytics may collect certain information about you from your computer, including through the use of cookies. Such information may include information regarding your visit (such as the pages you visit and the length of your visit), information about your device (such as your IP address), and other similar information about you. You can learn more about Google Analytics and how it collects and processes data (including how to control the information sent to Google) by visiting: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt-out of Google Analytics by using the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

## **IX. EXCLUSIONS**

As a provider of insurance products, CSE Insurance Group does not seek to, nor do we knowingly collect, information directly from children under the age of 16. If a child has directly provided us with personal information, a parent or guardian of that child may contact us to have the information deleted from our records. To do so, contact CSE Insurance Group through the information provided below in the “Contact Us” section.

## **X. INTERNATIONAL TRANSFER**

To facilitate CSE Insurance Group's operations, CSE Insurance Group may store, transfer or provide access to the personal information that you provide to CSE Insurance Group with or to our third party service providers around the world, including the United States. This Supplemental Privacy Notice shall apply even if CSE Insurance Group transfers such information to other countries. By providing us with any Claimant Information or by providing any information through the CSE Insurance Group Websites, you consent to the transfer of your personal information among the facilities in these countries, including those located outside your home country. Do not provide us with Claimant Information or provide us with personal information through the CSE Insurance Group Websites if you do not want your personal information to be transferred to the United States or to other countries, or if the laws in your country restrict these types of transfers.

## **XI. CONTACT US**

For questions or comments regarding this Supplemental Privacy Notice or our privacy practices, or to request a copy of this Supplemental Privacy Notice in another format, please contact us at:

***By Phone:***

1-800-282-6848

***By Postal Mail:***

Civil Service Insurance Company

2121 North California BLVD Suite 900

Walnut Creek, CA 94596

***By E-mail:***

customersupport@cseinsurance.com

## **XII. UPDATES TO SUPPLEMENTAL PRIVACY NOTICE**

From time to time, we may update this Supplemental Privacy Notice. If we do, we will note near the top of this page the date that any changes are made and/or when they become effective. If the changes being made are material, we may alert you to the changes in a more prominent way. By using the CSE Insurance Group Websites after these changes are made, you agree to the revised version of the Supplemental Privacy Notice.