



Richmond National Group, Inc. Privacy Policy

Richmond National Group, Inc. and its subsidiaries (each, “Richmond National,” “We” or “Us” or “Our”) is committed to safeguarding your privacy. This Privacy Policy (“Policy”) describes the types of information collected from visitors to Our website <https://www.richmondnational.com/> (“Website”), applicants for, purchasers of, or claimants under Our insurance policies, and other users of Our services. It also describes how that information may be used, your rights to access or update your information, and how you can limit its use or disclosure.

Note, that this Policy does not apply to information collected by Us offline or by any third party that may link from Our Website.

By using or accessing Our Website or by submitting information to Richmond National, you consent to the terms of this Policy.

In addition to reading this Policy, please review our Terms of Use, which governs your use of Our Website. **If you do not agree to Our Terms of Use and this Policy, please do not access or otherwise use this Website or any information or content contained on this Website.**

We reserve the right to change this Policy at any time. We will not make retroactive changes that reduce your privacy rights unless we are legally required to do so. Your continued use of the Services after the Effective Date constitutes your acceptance of this Policy. This Policy supersedes all previous versions.

A. Summary

We use personal information to conduct Our business. Personal information means any information that could be reasonably be used to identify you, including your first and last name, your home address, email address, telephone number, social security number, IP address, or geolocation data (“Personal Information”). For purposes of the California Residents section of this Policy, Personal Information takes the meaning assigned in the California Consumer Privacy Act (CCPA) of 2018, as amended by the California Privacy Rights Act of 2020 (“CPRA”).

As an example, We may require Personal Information to underwrite an insurance policy or to adjust a claim, or use it to evaluate the impact of Our marketing efforts. We understand and appreciate the trust Our customers and others place in Us to



protect that information from unauthorized access and use it as described in this Policy, in a lawful manner, and consistent with reasonable expectations. We take Our privacy obligations seriously.

B. Information We May Collect

Category of Personal Information	Sources
All categories	We may collect various kinds of information that you provide to us as well as information from your use of Our services and from third parties. For example, We receive your information when you send Us an e-mail, register for an account, participate in a survey, respond to feedback, or sign up to use Our services. We may use your Personal Information to evaluate your service needs and contact you regarding additional services you may find helpful. Please notify Us at privacy@richmondnational.com if you do not wish to receive such contact.
Internet activity	In addition to any information that you choose to submit to Us, Our third-party service providers may use technologies that automatically collect and store certain information when you interact with the Website. This information may include your: <ul style="list-style-type: none"> • IP address or other unique identifier; • Browser characteristics; • Operating system; • Domain name; • The site from which you enter Our website; • Dates and times of your visits; • The pages you visit and time spent on each page (“Clickstream data”); • The language your system uses; and • Time zone in which your device is located.
Identifiers from tracking technologies	Other technologies that store and collect usage information (“Tracking Technologies”) may also be used. Tracking Technologies may set or alter settings on your device. Tracking Technologies include, but are not limited to: <ul style="list-style-type: none"> •Cookies- Small data files sent from a website’s server and stored on your device’s hard drive either for the duration only of your visit – session cookies – or for a fixed period – persistent cookies. Cookies contain information that a web server can later read. •Pixels/Web Beacons- Small, generally transparent images embedded in web pages, applications, and emails. They also may be called “clear gifs,” “single-pixel gifs,” “page tags,” or “web bugs.” We may use pixels to track the web pages you visit, test the effectiveness of Our marketing, and find out if an email has been opened and acted upon. •JavaScript- A client-side code embedded in parts of websites and web applications. They help facilitate a variety of operations, including monitoring usage of various online components. •Browser Fingerprinting- Collection and analysis of information from your Device,

such as, without limitation, your operating system, plug-ins, system fonts and other data, for purposes of identification.

- ETag or Entity Tag- A feature of the cache in browsers. It is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of Device Identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and/or HTML5 cookies.

- Recognition Technologies- Technologies, including application of statistical probability to data sets, which attempt to recognize or make assumptions about users and devices (e.g., that a user of multiple devices in the same user).

We may use Tracking Technologies for a variety of purposes, including:

- Strictly Necessary- We may use cookies or other Tracking Technologies that We consider are strictly necessary to allow you to use and access Our Website, including cookies required to prevent fraudulent activity and improve security.

- Performance Related- We may use cookies or other Tracking Technologies that are useful in order to assess the performance of the Website, including as part of our analytic practices or otherwise to improve the content, products or services offered through the Website.

- Functionality Related- We may use cookies or other Tracking Technologies that are required to offer you enhanced functionality when accessing the Website, including identifying you when you sign in to our Website or keeping track of our specified preferences, including in terms of the presentation of content on our Website.

- Targeting Related- We may use Tracking Technologies to deliver content relevant to your interests on our Website and third-party sites based on how you interact with our content. This includes using Tracking Technologies to understand the usefulness to you of the content that has been delivered to you.

C. How We May Use Your Information

We may use information, including Personal Information, as described in this Policy.

We may use the information We collect for any of the following purposes:

- Transactions- We may store your information as part of a transaction history. We also may share your information with service providers that We use to complete your requests, operate Our services, and respond to your inquiries to Us.
- Support- We may use your information to provide service and product updates and distribute related feedback or satisfaction surveys to help Us improve Our service and product offerings.

- Text messages- We maintain strict privacy policies to protect the personal information of our users obtained for text message communications. This information is never sold, rented, released, or traded to others without prior consent or legal obligation. Any sharing of information with third parties is solely for the purpose of fulfilling the organization's obligations to the user. We guarantee that it will never be shared with third parties for marketing purposes.
 - **Text Message Opt-Out:** If you are receiving text messages from us and wish to stop receiving them, simply respond with either “STOP” or “UNSUBSCRIBE” to the number from which you received the message. Once we receive your message, you will no longer receive further text messages from us.
- Matching- We may use your information to match it with other public and private data to enhance Our records. We may also work with service providers who also possess information about you to improve Our marketing.
- Selecting Content- We may use your information to help create relevant and user-friendly content and assist navigation on Our Website.
- Account Information- We may store your information to maintain your profile or account. You may request to update your information at any time by sending an e-mail to privacy@richmondnational.com.
- Inquiries and Requests for Information, Services, or Quotes- If you have submitted an inquiry, requested information, services, or a price quote, We will provide your information to employees or independent agents to assist with your request. We may also use information for general marketing and advertising purposes, including sending advertising to you.
- Legal Compliance- We may be required to disclose information We collect to comply with legal or regulatory requirements or to protect the safety of Our customers, employees, or property.
- Corporate Sale, Merger, Acquisition, or Other Transfer of Assets- We may share your information as part of a corporate sale, merger, acquisition, or other transfer of some or all of Our assets, including as part of a bankruptcy proceeding.
- Fraud Prevention- We may use your information to help protect against fraud and other unlawful activities.
- Terms of Use- We may use your information to enforce Our Terms of Use.

D. Your Choices

- Cookies- You can change the settings on your browser to notify you each time a cookie is sent to you or to reject all or certain kinds of cookies; some of these browsers may block cookies by default. For information on how to change your browser settings please click the appropriate link below.
 - [Internet Explorer/Edge](#)
 - [Chrome](#)
 - [Safari](#)
 - [Firefox](#)
 - [Opera](#)

If you choose to reject cookies, Our Website may not function properly for you.

- Browser Settings- You can manage certain tracking technologies through your browser, including by clearing your browser cache history, or by changing your browser’s “Do Not Track” setting, if available.
- Website Analytics- For information about Google Analytics please click this link: <https://www.google.com/policies/privacy/partners/>. To opt-out of Google Analytics, click <https://tools.google.com/dlpage/gaoptout>. and download the Google Analytics opt-out browser add-on.

E. How We May Share Your Information

We may share the information that We collect from you, including Personal Information, with third parties as follows:

- When you consent- We may share Personal Information with third parties if you have given Us your consent to do so. We will only share sensitive Personal Information when you have given us your opt-in consent.
- To perform services- We may share information with service providers who assist us in Our business operations or with partners in order to provide you with quotes, products, and services.
 - **Co-Branded Areas-** We may provide certain parts of our Website in association with third parties, such as promotional partners or affiliates. These “co-branded areas” will identify the third party. If you choose to use these co-branded areas, We may share your information with the identified third party, and that third party may also collect information from you, in addition to the information that We collect, as described above. You should review the privacy policies of those identified third parties to understand how they collect and use information.
- For legal purposes- We will disclose Personal Information as We deem necessary to respond to a subpoena, regulation, binding order of a data



protection agency, legal process, governmental request or other legal or regulatory process. We may also share Personal Information as required to pursue available remedies or limit damages we may sustain.

Note that if you opt-in to text messaging, We will not share this information with third-parties.

F. We Do Not Sell Your Personal information

We do not sell Personal Information as a stand-alone product or service. If We pursue the sale, merger, liquidation, dissolution, or transfer of all or part of Our business trade, or assets, We may share information about you with prospective buyers under non-disclosure agreements. We may sell, assign, or transfer any or all Personal Information collected through Our website or through conducting the business of insurance to an acquiring party. Your use of Our Website and provision of Personal Information to Us demonstrates your consent to the sale and transfer of your information under such circumstances.

G. Links to Third Party Websites

Our Website may include links to other sites that we do not control. If you submit any information to any of those sites, their privacy policies will apply to that information. We are not responsible for the content, privacy policies, or practices employed by any other site.

H. Security and Data Retention

We retain information as long as it is necessary and relevant for our operations. We also retain Personal Information to comply with applicable law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, and other actions permitted by law. After it is no longer necessary for us to retain information, we dispose of it according to our data retention and deletion policies.

We employ industry-standard security measures designed to protect the security of all information submitted through the Services. However, the security of information transmitted through the internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data. Users of the Services are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our digital services. In order to protect you and your data, we may suspend your use of any of the Services,



without notice, pending an investigation, if any breach of security is suspected. Access to and use of password protected and/or secure areas of any of the Services are restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution.

In some instances, We may need to collect, other than through e-mail, and use Social Security Numbers (“SSNs”). We safeguard and protect the confidentiality of SSNs, prohibit the unlawful disclosure of SSNs, and limit access to SSNs to those employees or service providers who require access to that information.

We do not request sensitive information by e-mail. Please notify Us immediately at privacy@richmondnational.com if you receive an e-mail identified as coming from Us requesting sensitive information.

I. Children

We do not knowingly seek information from or about children under the age of 13 online, and We do not knowingly market any of Our products or services to children under the age of 13 online. In accordance with the Child Online Privacy Protection Act (“COPPA”), if we become aware that a child under the age of 13 is attempting to or has submitted information to Us via Our Website, We will delete the submitted information immediately.

J. Questions and Personal Information Updates

If you have questions about this Policy, please direct your questions to privacy@richmondnational.com.

It is your responsibility to maintain the accuracy of the information you submit to Us. If you are not a resident of California, and you would like to receive a copy of the Personal Information We have about you, please send a request to privacy@richmondnational.com. We will make reasonable efforts to comply with your request. If you believe this information is incorrect or incomplete, please notify Us. We will work to make any appropriate corrections or updates as promptly as possible and in accordance with applicable laws. You also may request that We limit Our use of your Personal Information. If you do, We will make reasonable efforts to do so.

K. International Users



Our Policy applies to users located in the United States. We maintain services in the United States whose laws may differ from those abroad. If you are located outside of the United States, note that the information We collect from you will be transferred and used in the United States, and that by using our website, you consent to such transfers and processing.

L. California Privacy Rights

The California Privacy Policy (“CA Policy”) supplements Richmond National’s general Privacy Policy and applies to all users who reside in the State of California (“consumers”). We adopt this CA Policy to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“CRPA”)(collectively, the “CCPA”).

This CCPA notice does not apply to consumers’ Personal Information exempted from the CCPA, such as Personal Information collected pursuant to (i) the federal Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act; or (ii) certain medical and health information covered by HIPAA.

In the past 12 months, We may have collected and disclosed for a business purpose the following categories of Personal Information about California consumers. As further set forth in the chart below, in the past 12 months, We may have disclosed California consumers’ Personal Information to third parties for business or commercial purposes. We do not sell Personal Information, as “sell” is defined under the CCPA.

Category of Personal Information	Description
Identifiers	Name, address, IP address, email address, account name, or other similar identifier.
Customer Records Information	Name, signature, address, phone number, social security number, insurance policy number, etc.
Personal Characteristics	Race, religion, sexual orientation, gender identity, age, gender expression.
Commercial Information	Records of personal property, services purchased or considered.
Biometric Information	Hair color, eye color, height, voice, facial recognition, and other biometric data.
Internet or Other Electronic Network Activity	Browsing history, search history, and information regarding a consumer's interaction with a website.
Geolocation Data	Physical location.
Professional Information	Current and/or past employment history.
Education Information	Information that is not “publicly available personally identifiable information” as defined in the California Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
Inferences from Other Personal Information	Information from a consumer that reflects the consumer's preferences, behavior, or characteristics.

Audio, Video, and other Electronic Data

Audio information including call recordings, video, and photographs, recorded meetings and webinars.
SSNs and other government identification numbers, financial account credentials, health information, etc.

Sensitive Personal Information

- Categories of Sources- We collect Personal Information from the following categories of sources: Consumers, agents and brokers, service providers, consumer data resellers, and government entities.
- Uses of Personal Information-
 - Insurance service and product development;
 - Communications to respond to inquiries;
 - Insurance claims investigations;
 - Marketing;
 - Compliance with legal requirements;
 - Enforcing Our Terms of Use;
 - Protection of our Consumer's rights; or
 - Internal business purposes.
- Third parties with which Personal Information may be shared-
 - Affiliate companies;
 - Financial service providers, such as independent agents, brokerage firms, and insurance companies;
 - Website hosting or information technology consulting service providers;
 - Marketing and promotion service providers;
 - Data analysis service providers;
 - Legal service providers;
 - Accounting service providers;
 - Administrative service providers;
 - Security service providers;
 - Application service providers; or
 - Nonaffiliated companies with whom we have a marketing or other business relationship, including nonaffiliated financial service providers with whom we jointly market products, or consumers' employer groups to whom we provide services.

The CCPA provides California residents with specific rights regarding their Personal Information. Unless an exception applies, California consumers have the right to make the following requests:

- Right to Know- To the extent that the CCPA is applicable to your data, you have to right to request that We disclose to you:
 1. The categories of Personal Information we have collected about you;

2. The categories of sources from which the Personal Information is collected;
 3. The business or commercial purpose for collecting, selling, or sharing Personal Information;
 4. The categories of third parties to whom we disclose the Personal Information; and
 5. The specific pieces of Personal Information We have collected about you.
- Right to Correct- You have the right to request that We correct your Personal Information if the information we have is inaccurate.
 - Right to Delete- To the extent that the CCPA is applicable to your data, you have to right to request that We delete your Personal Information. Please be aware, however, that California law allows Us to retain your Personal Information under certain conditions, even if you have asked Us to delete it, such as when retaining your Personal Information is necessary for us to complete a transaction with you or provide you with a service you have requested.
 - Right to Opt-Out- You have the right to opt-out of the selling and sharing of your Personal Information. To submit a request, email Us at the link below. We will process your request(s) in accordance with applicable law. Note: Richmond National does not sell Personal Information.
 - Right to limit Use and Disclosure of Sensitive Personal Information- We do not generally, use, or disclose sensitive Personal Information for purposes beyond those authorized by the CCPA. However, if We discover that We have, you have a right to limit the use of sensitive Personal Information that is collected or processed.
 - Right to Non-Discrimination- We will not discriminate against you for exercising any of the rights described in the CCPA.

Exercise your Rights- Submit your request to privacy@richmondnational.com.

We retain the Personal Information we collect only as reasonably necessary for the purposes described in this CA Policy or otherwise disclosed to you at the time of collection.

M. Other State Privacy Rights

Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia (now or in the future) provide their residents with special rights to:



- Access their Personal Information held by Us;
- Delete their Personal Information held by Us;
- Correct inaccuracies in their Personal Information;
- Opt-out of sales;
- Not be discriminated against for exercising their rights;
- Either limit or require consent to process sensitive personal data.

The scope of these rights varies by state. Please contact us at privacy@richmondnational.com to exercise any of these rights.

Nevada- Nevada provides its residents with a limited right to opt-out of certain Personal Information sales. Nevada residents who wish to exercise this sale opt-out rights may submit a request to us at privacy@richmondnational.com. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Maryland- We do not sell personal data and We do not collect, process, or share Personal Information unless it is strictly necessary to provide or maintain a specific product or service requested by the customer.

N. Contact Us

If you have any questions or comments about this Policy, the ways in which we collect and use your information described in this Policy, your choices and rights regarding such use, or wish to exercise your rights under a state specific law, please do not hesitate to contact us at:

- Email: privacy@richmondnational.com
- Address: Richmond National Group, Inc., Attn: Legal and Compliance Department, 11013 West Broad Street, Suite 300 Glen Allen, VA 23060

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