



Privacy and Data Security Policy

Last updated: January 12, 2024

We believe your privacy and information security are important. If you have issues or concerns relating to the following privacy policy, call us at (800) 823-4852, M – F, 8 am – 5 pm. Our team of specialists supports insurance agents, investment advisors, financial institutions, and their clients in obtaining insurance coverage. In the process, we take every possible measure to protect your information.

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Our Responsibilities to You

We strive to adhere to the highest standards of data security. Any and all data found within our systems or sent via our email servers is encrypted, adhering to HIPAA requirements as published. Although not a “covered entity” under HIPAA, we do subscribe to and maintain HIPAA standards and guidelines for your security. In addition, all our workstations and servers are encrypted both at rest and in transit, as described in more detail below.

Online Security

Pinney Insurance Center, parent company of Insurance Division, is an accredited member of the BBB Online Reliability Program. All Insurance Division websites and quoters use restrictive firewalls to protect stored data, which includes any personally identifiable information you have submitted on this site, which also uses 128 bit SSL (Secure Sockets Layer) Certificates to encrypt and protect all personal information submitted through our online forms.

It is suggested that you use a browser that supports SSL and that the encryption feature of your browser is not disabled when you submit information online (we recommend Firefox, Safari, Opera, or Chrome). In addition to SSL, we also use firewalls to secure all data stored on our servers, which includes any personally identifiable information you have submitted to us.

We make every effort to help our clients complete the life insurance application process using secure electronic means, including the e-signature process. The e-signature process transmits data, including your electronic signature, through third-party vendors including DocuSign, iGo, or Marketech, all of which are HIPAA-compliant e-application and e-signature processes.

If you are unable to use the e-signature process, you may request that an application be emailed to you. We send all emails securely using TLS encryption. We do this using MicrosoftOffice365, which also adheres to and meets the specifications of:

1. **Health Insurance Health Insurance Portability and Accountability Act (HIPAA):** HIPAA imposes security, privacy, and reporting requirements regarding the processing of electronic protected health information. Microsoft developed Office 365 to provide physical, administrative, and technical safeguards to help users comply with HIPAA.
2. **Data Processing Agreements (DPAs):** We provide customers with additional contractual assurances through DPAs regarding Microsoft handling and safeguarding of customer data. By signing DPAs, we commit to over 40 specific security commitments collected from regulations worldwide.
3. **Federal Information Security Management Act (FISMA)** requires U.S. federal agencies to develop, document, and implement controls to secure their information and information systems. **Federal Risk and Authorization Program (FedRAMP)** is a federal risk management program that provides a standardized approach for assessing and monitoring the security of cloud products and services. The [FedRAMP/FISMA FAQ](#) describes how the Office 365 service follows security and privacy processes relating to FedRAMP/FISMA.
4. **ISO 27001:** ISO 27001 is one of the best security benchmarks available in the world. Office 365 has been verified to meet the rigorous set of physical, logical, process and management controls defined by [ISO 27001:2013](#). This also includes ISO 27018 Privacy controls in the most recent audit. Inclusion of these new ISO 27018 controls in the ISO assessment will further help Office 365 validate to customers the level of protection Office 365 provides to protect the privacy of customer data.
5. **Statement on Standards for Attestation Engagements No. 16 (SSAE 16):** Office 365 has been audited by independent third parties and can provide SSAE16 SOC 1 Type I and Type II and SOC 2 Type II reports on how the service implements controls.
6. **Gramm–Leach–Bliley Act (GLBA):** The Gramm–Leach–Bliley Act requires financial institutions to put processes in place to protect their clients' nonpublic personal information. GLBA enforces

policies to protect information from foreseeable threats in security and data integrity. Customers subject to GLBA can use Office 365 and comply with GLBA requirements.

In addition, all consumer data held in our databases is:

- Encrypted connection between client and application server
- Encrypted connection between application server and database sever
- Encrypted connection between application server and Amazon Web Services cloud storage (S3) server
- Encrypted data at rest on Amazon Web Services cloud storage (S3) server
- Encrypted data at rest for the entire file-system for the entire database

This last measure is well beyond the requirements of HIPAA or any similar legal authority; however, we feel it is the only prudent measure to take in protecting the data of our clients and partners.

Please do be aware that we are not responsible for the security of the content in our emails, including attachments, once they reach your email service provider. The paragraph below explains why that data may not be secure and why we strongly recommend using the secure, compliant e-signature process.

When an email is transmitted from our specialist's computer, it passes through our email server and is routed through multiple servers until it reaches your email server. TLS encryption is negotiated each time the email passes from one server to another. If the email reaches a server that does not support TLS encryption, the connection will be downgraded to an unencrypted transmission and the email will be sent in plain text (unencrypted format). Common email providers such as Gmail and Yahoo *do* support TLS, but we do not require our clients to use compliant email providers. We suggest you contact your email provider to confirm whether they support TLS or similar encryption processes, or if at all possible, complete your application using the secure e-signature process.

You may initiate or participate in email communication with us at any time. By doing so, you are assumed to consent to PHI and other covered information being sent via email (securely or unsecurely) unless you expressly state otherwise before the email communication takes place. We may provide a warning, and will endeavor to do so, but it is not required by law.

We take all reasonable and commercial efforts to protect your data, however, no system is perfectly secure or reliable, the internet is an inherently insecure medium, and the reliability of hosting services, internet intermediaries, your internet service provider, and other service providers cannot be assured. When you use the Insurance Division website, you accept these risks, and the responsibility for choosing to use a technology that does not provide perfect security or reliability.

If you feel more comfortable submitting your information by phone, please call us at 1-800-823-4852.

Why We Collect Visitor Information

There are four reasons why we collect consumer information. (1) Information is collected to provide real-time, accurate life insurance quotes. (2) Information is collected to initiate the application request process and/or to begin the purchase of life insurance. (3) Information is collected regarding your use of this site in an effort to make this site better for our users. (4) Information is collected regarding your

general geographic location, the site that referred you to this site, and hardware and software used to view this site in an effort to optimize our marketing efforts.

The only personally identifying information collected on this site is provided by you, the user, voluntarily. Site usage statistics and aggregate user profiles are analyzed to see user trends and are not used to track the usage patterns of individual users.

What Information We Collect and How We Use It

Insurance Quote Request Form

Insurance Division specialists, partners, and affiliates provide insurance quotes free of charge. To provide accurate insurance quotes, certain information must be collected, including state of residence, date of birth, gender, height, weight, coverage amount desired, term period desired (in the case of term life insurance), health classification of the proposed insured, and tobacco use. For simplified issue and guaranteed issue life insurance quotes, other health information may also be required.

All life insurance carriers have proprietary rate guidelines based on the previously mentioned information. To provide accurate quotes and rates from these carriers, the information mentioned above must be collected.

Insurance Application Request Form

This form represents the initiation of the insurance purchasing process. By filling out this form, you are requesting contact by a member of our staff regarding your purchase of insurance. The information collected on this form (name, mailing address, email, and phone numbers) will be used only to contact you regarding your purchase of insurance. We do not sell or give away this information. We may share this information with carriers, affiliates, vendors, and partners (such as life insurance carriers) in an effort to provide the best service and products to our clients.

This form also requests other health and lifestyle information that is required on the majority of insurance applications. You do not need to fill out this information online, but you will need to provide it at some point during the application process.

Cookies

A cookie is a piece of data stored on a user's computer that is tied to information about that user. None of the cookies this site uses are linked in any way to personally identifiable information.

This site uses both session ID cookies and persistent cookies. Session ID cookies terminate once the user closes the browser. Persistent cookies are small text files stored on the user's hard drive for a certain period of time. Persistent cookies can be removed at any time by following help directions provided by your Internet browser. Cookies may be disabled at any time by following help directions provided by your internet browser.

Information collected by cookies is analyzed to determine the effectiveness of our site. Users that reject our cookies may still use our site.

Log Files

When visitors enter and surf through the pages of our site, our server logs information including the internet address of the server or computer contacting us, the date and time, the referring site and its URL, as well as the visitor's browser, operating system, and screen resolution. This data is analyzed to understand better what our visitors are looking for and to improve the quality of our site. We look for trends, identify most- and least-visited pages, and collect broad demographic information. None of the information gathered through our log files is shared with or sold to outside organizations. Nor do we look at individual users and their usage patterns, or use these technologies to gather emails or personally identifiable information.

How We Communicate with Our Clients

Once a user has initiated a relationship with Insurance Division, various forms of communication may ensue. They include (1) contact by telephone; (2) contact by email; (3) contact by mail; (4) contact by fax; (5) contact by SMS text. All contact is to help our clients apply for, purchase, and/or get life insurance and/or other forms of insurance (such as annuity, auto, home, health, etc.). Contact may come from Insurance Division or any one of its carriers, affiliates, vendors, or partners. We adhere to the provisions of the Telephone Consumer Protection Act (TCPA) and the CAN-SPAM Act.

By submitting a quote request, you agree to this privacy policy and terms of use, including receiving offers of insurance from Insurance Division or our partner agents at the email address(es) and phone number(s) you provide. All calls to and from Insurance Division are recorded. Our communication with you may include autodialed or pre-recorded calls, emails, and SMS or MMS messages. We may also contact you to market our products and services. You may opt out at any time, and are not required to provide this authorization in order to receive services from Insurance Division.

If at any time you desire that we cease contact with you, please send a letter detailing your request to the following address:

Insurance Division
2266 Lava Ridge Court
Roseville, CA 95661

You may also call us directly at (800) 823-4852.

Your Personal Information Options

Our life insurance quoters are available on websites belonging to Insurance Division and our partners and affiliates for public use without providing any personally identifiable information.

By providing your personally identifiable information, you are explicitly initiating a relationship (as defined by the National Do Not Call Registry) with Insurance Division and the partner or affiliate whose quoter you used to receive a quote. By doing so, you are inviting, consenting to, and requesting contact and information from an Insurance Division specialist which may be provided to you online, by phone, fax, email, or mail by Insurance Division or one of our carriers, affiliates, vendors, or partners. As such, you are waiving any right (including claims under the Telemarketing Sales Rule) extending in perpetuity to claim that we, or our carriers, affiliates, vendors, or partners, contacted you without your express consent.

If at any time you desire that we cease contact with you, we will honor your request to place you on our internal “Do Not Contact” list.

Email

You can unsubscribe from our email mailing list at any time by clicking on the “unsubscribe” link at the bottom of any one of our emails.

Update/Change Personal Information

If you would like to update or change the personal information we have on file for you, please contact us at 1-800-823-4852.

Cookie Opt-Out

As explained in this Privacy Policy, we use cookies and other tracking technologies to analyze traffic on our Sites and facilitate advertising. If you would like to learn how you may opt out of the use of cookies and other tracking technologies, please review the instructions provided by the U.S. government at [usa.gov/optout-instructions](https://www.usa.gov/optout-instructions).

Carrier, Partner, Vendor, and Affiliate Privacy Policies

Insurance Division may share your personally identifiable information with insurance carriers or other partners, vendors, or affiliates for the express purpose of assisting you in your purchase of insurance. Insurance Division is not liable or responsible for these third-party companies’ privacy policies or procedures, or any loss or breach of data through these third-party systems. Please contact these individual organizations with questions regarding their Privacy Policies.

Website Areas Beyond Insurance Division’s Control

Public Forums

The site may include interactive forums such as message boards and chat rooms. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information.

Third Party Websites

The site may contain links to other websites. If you choose to visit other websites, we are not responsible for the privacy practices or content of those other websites, and it is your responsibility to review the privacy policies at those websites to confirm that you understand and agree with their policies.

Spam Policy

Insurance Division does not spam. Spam or UCE (Unsolicited Commercial Email) is an attempt to deliver an email to someone who would not choose to receive it. If you receive an email from an Insurance Division specialist, it is because (1) you expressly shared your email address with us for the purpose of receiving information in the future (also known as “opt-in”), or (2) you have purchased from us or have a current relationship with us.

By requesting information from us or providing your contact information on our site, you have agreed to opt-in to receive our information.

You can unsubscribe from our email mailing list at any time by clicking on the “unsubscribe” link at the bottom of any one of our emails.

Privacy Policy Updates

This Privacy Policy may be updated at any time. We are always looking for new and safer ways to protect our clients’ information. Consequently, this Privacy Policy may be updated to reflect those changes. It is suggested that you review this Privacy Policy each time you use this site.

Additional Information for California Residents

California law requires us to provide California residents with additional information about the way we collect, use, and share your “personal information” (as defined in the California Consumer Privacy Act of 2018 (the “CCPA”).

Certain federal and state financial regulations, including the GLBA, the California Financial Information Privacy Act (“FIPA”), and certain federal and California health privacy laws govern the information you provide when seeking, applying for, and/or purchasing insurance products or services. That information is therefore not subject to the CCPA. Because of this, we will here provide disclosures and information for California residents regarding the limited personal information we collect that is subject to the CCPA.

California residents who have established a business relationship with us may choose to opt out of us sharing their personal information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out; or (2) you wish to request certain information regarding our disclosure of your personal information to third parties for their direct marketing purposes, please contact us at 1-800-823-4852.

In the preceding twelve months, we collected and disclosed the following categories of personal information about applicants who are California residents:

Category	Examples	Do We Collect This?	Who This Information Is Disclosed to for a Business Purpose
Identifiers	First and last name, postal address, email address, IP address, mobile device ID, driver’s license number, social security number, date of birth.	Yes	<ul style="list-style-type: none">• Service providers who process information on our behalf• Insurance Carriers• Referral Partners
Personal information categories listed in the California Customer Records statute	First and last name; age, citizenship or immigration status, signature, social security number,	Yes	<ul style="list-style-type: none">• Service providers who process information on our behalf• Insurance Carriers

	physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, employment history, medical information, insurance policy number, bank account number		<ul style="list-style-type: none"> • Referral Partners
Protected classification characteristics under California or federal law	Race, gender, age, marital status, disability	Yes	<ul style="list-style-type: none"> • Service providers who process information on our behalf • Insurance Carriers • Referral Partners
Commercial information	Personal property information	Yes	<ul style="list-style-type: none"> • Service providers who process information on our behalf • Insurance Carriers • Referral Partners
Biometric information	Voice recordings	Yes	<ul style="list-style-type: none"> • Service providers who process information on our behalf • Insurance Carriers • Referral Partners
Internet or other similar network activity	Cookies and information on a user's interaction with the Site, device ID, other device information.	Yes	<ul style="list-style-type: none"> • Service providers who process information on our behalf • Insurance Carriers • Referral Partners
Geolocation data	IP address and mobile device ID	Yes	<ul style="list-style-type: none"> • Service providers who process information on our behalf • Insurance Carriers • Referral Partners
Sensory data	Telephone communications, voice recordings.	Yes	<ul style="list-style-type: none"> • Service providers who process information on our behalf • Insurance Carriers • Referral Partners

Professional or employment-related information	Title of profession, employer, income, employment history	Yes	<ul style="list-style-type: none"> • Service providers who process information on our behalf • Insurance Carriers • Referral Partners
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The above listed recipients are consistently disclosed the listed information for a business purpose (quoting, applying for, and purchasing insurance products). Additional recipients who may occasionally receive disclosures for a business purpose include third-party advertising partners such as social media networks (information disclosed to social media networks, if at all, is limited to name, email, zip code, and date of birth).

Purposes for Collection, Use, and Sharing. We use and disclose the personal information we collect for our commercial purposes, as described in the section of this Privacy Policy titled “What Information We Collect and How We Use It.” This includes business purposes such as:

- Auditing related to our interactions with you;
- Legal compliance;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and necessary prosecution;
- Debugging;
- Performing services (for us or our service provider);
- Internal research for technological improvement;
- Internal operations;
- Activities to maintain and improve our services; and
- Other one-time or short-term uses.

California Residents’ Privacy Rights. Except as excluded above or limited below, the CCPA grants California residents the following rights to Request:

- **Information.** You can request information about how we have collected, used and shared your Personal Information during the past 12 months. We have made this information available to California residents without having to request it by including it in this Privacy Policy.
- **Access.** You can request a copy of the personal information that we maintain about you.
- **Deletion.** You can ask us to delete the personal information that we collected or maintain about you.

Please note that there are various lawful reasons why we may not be able to delete your data or may be required to hold certain personal information — for instance, (i) where we must comply with legal, regulatory, or other requirements, (ii) in case of exercising or defending legal claims, and/or (iii) where regulatory or contractual retention periods apply.

Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain sensitive information in response to an access request and limiting the circumstances in which we must comply with a deletion request. If we deny your request, we will communicate our decision to you.

We will respond to requests within 45 days of receiving your request, unless we need more time, in which case we will notify you and may take up to 90 days total to respond to your request. We will not discriminate against you for exercising these rights.

To request access to or deletion of personal information, call us at 800-823-4852 or contact us at the address below:

Insurance Division
2266 Lava Ridge Court
Roseville, CA 95661

The CCPA requires us to verify the identity of the individual submitting a request to access or delete personal information before providing a substantive response to the request.

California residents can empower an “authorized agent” to submit requests on their behalf. We will require the authorized agent to have a written authorization confirming that authority and are required to verify their identity.

We do not sell personal information.

Contact Us

If you have any questions regarding this document, our procedures and policies, this site, or your relationship with us, please contact us at the address below or call us at 1-800-823-4852.

Insurance Division
2266 Lava Ridge Court
Roseville, CA 95661