California Consumer Privacy Act Notice

Notice at Collection

Last Updated: 04/18/2025

This **Privacy Notice for California Residents** supplements the information contained in Paddio Insurance Online Privacy Notice (https://www.paddioinsurance.com/privacy-policy/) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Lawfully obtained, truthful information that is a matter of public concern.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
    - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Your Personal Information

We do not sell the personal information, or the sensitive personal information we collect. We do not share the personal information, or sensitive personal information, that we collect with third parties for cross-context behavioral advertising.

In particular, we have collected the following categories of personal information and sensitive information listed in the tables below. The tables also list, for each category, our use purposes, and whether we sell the information or share it with third parties for cross-context behavioral advertising.

Data Retention

We store your personal information for different lengths of time depending on the category of personal information and the purpose for its collection and use. We will retain your data for as long as needed, or permitted, based on the reason why we obtained it. We will not retain personal information for longer than is reasonably necessary for any disclosed purposes. This means we may retain your personal information even after you close your account with us. Some information may be deleted automatically based on specific schedules, such as financial information. Other information (e.g., account information), may be retained for a longer period of time. Finally, we may further retain information for business practices based on our legitimate business interests or legal purposes, such as network improvement, fraud prevention, record-keeping, or enforcing our legal rights or defending legal claims.

When deciding how long to keep your information, we consider criteria, such as:

- The duration, and nature, of any relationship with you or service that we have provided to you;
- Whether we are subject to any legal obligations (e.g., any laws that require us to keep transaction records for a certain period of time before we can delete them); or
- Whether we have taken any legal positions (e.g., in connection with any statutes of limitation or in response to any legal hold or regulatory requests).

Rather than delete your data, we may de-identify it by removing identifying details.

Personal Information Category	**Business Purpose**	**Sold or Shared**
Identifiers: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Performing services, providing financial and customer service; providing online products and services; for marketing and advertising purposes; providing customer service; protection against fraud.	No
California Customer Records personal information: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Protecting against fraud and providing financial services.	No

Protected classification characteristics under California or federal law: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.	Performing services and complying with state and federal law.	No
Commercial information: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Providing online products and services; for marketing and advertising purposes; providing customer service.	No
Internet or other similar network activity: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Providing online products and services; for marketing and advertising purposes.	No
Geolocation data: Physical location or movements.	Detecting security incidents or fraud; debugging mobile application.	No
Professional or employment-related information: Current or past job history or performance evaluations.	Providing financial services.	No
Inferences drawn from other personal information: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Providing financial and customer service; for marketing and advertising purposes.	No

Sensitive Personal Information Category	Business Purpose	Sold or Shared
Government identifiers (social security, driver's license, state identification card, or passport number).	Performing services, providing financial and customer service; providing online products and services; for marketing and advertising purposes; providing customer service; protection against fraud.	No
Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password).	Providing online products and services; providing customer service.	No
Racial or ethnic origin.	Performing services and complying with state and federal law.	No

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete, mortgage applications, or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Websites.
- From our affiliates.
- From third parties, such as an internet advertiser, a mortgage lead generator, your prior mortgage servicer, or government entities from which public records are maintained.
- From our service providers and contractors, who we engage to further our business purposes.

We also collect demographic information. Demographic information is all other information such as gender, zip code, or any information that is not tied to your personal information. In addition, we may receive information about you from other online or offline sources, including third parties from whom we validate consumer self-reported information, and verify information we already have about you. This helps us to update, expand and analyze our records and provide products and services that may be of interest to you.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to apply for a loan or ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.

- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, 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 about our consumers is among the assets transferred.
- For auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- To help ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes.
- For debugging to identify and repair errors that impair existing intended functionality.
- For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us, provided that your personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us.
- To perform services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services.
- To provide advertising and marketing services, except for cross-context behavioral advertising, to you.
- For undertaking internal research for technological development and demonstration.
- For undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

- To advance a person's commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Use of Sensitive Personal Information

We may use or disclose the sensitive personal information we collect for one or more of the following purposes, provided that the use of your sensitive personal information is reasonably necessary and proportionate for this purpose:

- To perform the services reasonably expected by your request.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- To perform services on behalf of our business such as maintaining or servicing accounts, providing customer service, verifying customer information, processing payments, or providing financing.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with our business.
- To verify or maintain the quality or safety of a service, that is owned, or controlled by us, and to improve, upgrade, or enhance the service that is owned, or controlled by us.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For purposes that do not infer characteristics about you.

We will not collect additional categories of sensitive personal information or use the sensitive personal information we have collected for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosing Personal Information

We may disclose your personal information to a service provider or contractor for a business purpose, subject to your right to opt-out of those. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract or as otherwise

permitted by you. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

We disclose your personal information with the following:

- Service providers.
- Contractors.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we and/or third parties provide to you.

Sales of Personal Information

In the preceding twelve (12) months, Paddio Insurance has not sold personal information.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

California residents who are employees, job applicants, or former employees of Paddio Insurance click here to view our CCPA Notice for Employment Purposes.

Right to Know Request - Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose the categories of information we shared.

Information we collect or share in our role as a financial institution may not be included in your Right to Know response.

If you request that we disclose the required information beyond the 12-month period, then we shall provide that information unless doing so proves impossible or would require a disproportionate effort. Your right to request required information beyond the 12-month period, and our obligation to provide that information, only applies to personal information collected on or after January 1, 2022.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.

Right to Correct Inaccurate Information

You have the right to request that we correct any inaccurate personal information that we maintain about you. Once we receive and confirm your verifiable consumer request, we will use commercially reasonable efforts to correct the inaccurate personal information as directed by you. In responding to your request, we will take into account the nature of the personal information, and the purposes of the processing of the personal information.

Exercising California Consumer Rights Requests

To exercise the access, data portability, correction, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 833-598-7643.
- Visiting www.paddioinsurance.com/ccpa-request/.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot 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.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

We will deliver our written response to the primary email address that you submit with your request.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's

effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes**.

Contact Information

If you have any questions or comments about this notice, the ways in which Paddio Insurance collects and uses your information described above and in our Privacy Policies, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 833-598-7643

Website: https://www.paddioinsurance.com/privacy-policy

Postal Address:
Paddio
Attn: Paddio Customer Service
1400 Forum Blvd., Ste 18
Columbia, MO 65203

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