

# **Privacy Policy**

## **NOTICE OF INFORMATION PRACTICES**

PEMCO appreciates the trust you place in us when you purchase insurance from us, and we value you as a customer. Your privacy is important to us, and we're committed to protecting your nonpublic personal information ("personal information" or "information"). This Privacy Notice applies to PEMCO Mutual Insurance Company (PEMCO) and affiliates.

This notice describes how we protect, collect, use, and share customer information. This information is often called nonpublic personally identifiable information because it is nonpublic information related to an identified individual. It does not include anonymized data or de-identified data which do not describe the identity of an individual.

To learn more about how we collect and use information about you, please read the following notice.

## **WHAT INFORMATION DO WE COLLECT ABOUT YOU?**

You provide most of the information we need during the application process, either through your agent, online or on the phone. We ask for information such as your name, address, email address, phone number, driver's license, social security number, date of birth, gender, marital status, and type of vehicle you drive. We also ask about people in your household.

In addition, we may obtain other information, including but not limited to the following:

- We may obtain information from consumer reporting agencies and insurance support organizations to evaluate your insurance risk, including your credit-based insurance score. These reporting agencies may retain your information, and they may disclose it to others.
- We also may gather information from consumer reporting agencies, insurance support organizations, your past insurers, transactions with our affiliate(s) and/or government agencies. This can include your past policies and claims history, driving record; transactions such as payment history, coverage levels, possible drivers and vehicles associated with your household; and odometer readings associated with any of your vehicle(s).
- For property insurance policies, we get information about your property from third-party reports, and we may ask an independent inspector to visit your property to inspect its condition. We may also use geospatial information and take pictures or a video of your property. Sometimes we may need to schedule an interior inspection.
- The mobile app used for our My Driving Discount program collects location data to evaluate your driving even when the app is closed or not in use.

In some instances, we may need to know about your health. For example, if we need to know whether a physical limitation will affect your ability to drive, we may ask for a

statement from your doctor. We may also need this information to adjust your claim, or to detect and prevent fraud. We will not share your medical information with our affiliates or non-affiliates unless you specifically authorize us to share or if we are permitted to, or required to, by law.

We treat your information confidentially whether you are an applicant, a customer, or a former customer.

## **HOW WE USE YOUR INFORMATION**

We use your information to underwrite and rate your policy, to manage your transactions with us, and to process claims. We only disclose personal information about you as permitted by law. Generally, this includes sharing it with third parties to administer your transactions with us, service your insurance policy or claim, detect and prevent fraud, or sharing with your authorization. We require parties with whom we share your information to use your personal data only for the reasons we share it with them. These third parties may include:

- Insurance support organizations, consumer reporting agencies or other insurance companies (including for the detection and prevention of fraud);
- Independent insurance producers authorized to sell PEMCO insurance products;
- Independent contractors who support the adjustment of claims;
- Auditors, attorneys, courts and government agencies;
- Other companies which may reinsure your policy or with which you have other coverage;
- Other companies and insurance support organizations for actuarial or research studies;
- Other companies that perform marketing services on our behalf or with financial institutions with which we have joint marketing agreements for products offered by PEMCO;
- Courts or governmental entities in response to a judicial process or government regulatory authority who has jurisdiction over us or for other purposes permitted by law;

We also use your information to perform our own research, testing and product development, or for our own actuarial analysis to develop actuarial and pricing models.

Information about our transactions with you (such as payment history) and experiences (such as claims made) may be shared with our affiliates.

## **ADDITIONAL INFORMATION FOR PARTICIPANTS IN TELEMATICS PROGRAMS**

Additional information for policyholders enrolled in our telematics program(s) is included in the endorsement(s) provided upon enrollment in the program(s).

## **PROTECTING YOUR INFORMATION FROM UNAUTHORIZED ACCESS**

Protecting your privacy is important to us. We maintain physical, electronic, and administrative safeguards to protect your information from unauthorized access and comply with applicable federal and state regulatory standards. Our employees are authorized to access customer information only for legitimate business purposes and are required to maintain the confidentiality of your personal information. Our employees review and agree to follow our Code of Ethics, which includes the expectation that employees honor the privacy of our customer information.

## **INDEPENDENT PEMCO INSURANCE AGENTS**

The independent insurance agents (producers) authorized to sell PEMCO products are not PEMCO employees and are not subject to PEMCO's privacy policy. Because they have a unique business relationship with you, they may have additional personal information about you that PEMCO does not have. They may use this information differently than PEMCO. Contact your PEMCO agent to learn more about their privacy practices.

## **COLLECTION OF YOUR INFORMATION**

Internet security

### ***Information collected***

PEMCO wants to improve your online experience with us. That's why we want you to be aware of the type of information we collect during your online experience. We collect your name, address, and other information only when you provide it to us. When you provide this information, we may be able to save some of it for a future visit to our site. For example, if you start a quote request, we save this information, using strong security protocols, so that if you return to our website you won't have to re-enter the same information. Through a service we use with a third party, once you give us some basic information like your name, address and date of birth, we may be able to pre-fill your insurance information such as what vehicles you own and what drivers live in your home.

We use "cookies" and other analytical tools to track your visits to our websites, record information about your navigation of our website, and your use of our mobile applications. The information we obtain from cookies is non-personally identifiable information. This means we can't identify you personally just because you visited our site. We are simply adding your experience to statistics we compile about the use of our websites.

Our mobile and social media sites may also collect non-personally identifiable demographic information about you (such as age, gender, city and state). We count the number of downloads of our mobile applications, how many visitors we have on our social media sites, and how many viewings we have of our website.

We use these statistics to develop new services and improve our online content. We want to know what you like and dislike about our site, and where you may have trouble navigating our website. Although most browsers allow you to disable cookies, doing so

may require you to re-enter information because the history on our website is not saved. Rest assured, the information within these cookies is encrypted and our security measures are designed to prevent others from accessing any of your information.

We also may use advertising companies to display our ads on other Websites. These advertising companies may collect non-personally identifiable information about the websites you visit and what you purchase to display ads about products and services that may interest you. We may also share information about your use of our website with these companies to collect market research.

### ***Website security***

The privacy and confidentiality of your information is important to us. We use strong security protocols to help protect your data from access while it is in transit. This means that we encrypt your data while it is being sent. Only those who have a job reason to access our servers are permitted to access the servers. Our employees subscribe to a Code of Ethics and are aware of the privacy of personal information.

All personal data transactions on our website are handled with 128-bit SSL (Secure Socket Layer) encryption (the industry standard). An encrypted SSL connection requires all information sent between a client and a server to be encrypted, protecting private information from interception over the Internet.

The member account portion of our website is available only to policyholders. You are allowed access to your policy and account information in a private and secure manner.

This means that to access the quote, policy and billing information pages, you also need to use a web browser that supports 128-bit encryption. Our web pages can be accessed by users of Microsoft Internet Explorer 6 and more recent versions. You can also reach our website through use of Google Chrome, Safari and Firefox.

### ***Email***

In general, Internet email messages are not secure, unless they are encrypted. You should use discretion before submitting any personal or financial information via email.

Information communicated via email messages traveling through the Internet may be intercepted, collected, used or disclosed by others. If you are concerned about the security of email communications, please send your forms or correspondence through the postal service or use the telephone to contact us directly.

### **DATA RETENTION**

We retain your information to fulfill business needs, provide services, and to satisfy legal, accounting, and regulatory requirements.

A request to delete a mobile application account applies only to the credentials and account created within the application. Other information is retained subject to our standard retention periods.

## **DATA CORRECTION AND DELETION**

If you believe that information furnished by us to a consumer reporting agency is incorrect, you may dispute the information by providing a written notice to us that identifies the specific information being disputed, the basis for the dispute, and all supporting documentation required by us to substantiate the basis of the dispute.

We will review your request and respond within 5 business days. If our investigation reveals that the disputed information was incorrect, we will notify each consumer reporting agency to which the information was furnished.

To review your personal information in our records, send a written request to us at P.O. Box 778, Seattle, Washington 98111-0778, Attention: Records Request.

### ***For Oregon residents only***

Access to records

### **How you can review your personal information in our records**

To review your personal information in our records, send a written request to us at P.O. Box 778, Seattle, Washington 98111-0778, Attention: Records Request. The requested information will need to be reasonably described and reasonably locatable and retrievable.

Within 30 business days of receiving your written request, we will advise you what information is available. A copy of the information can be mailed to you. We will also name anyone we show as having received the information within two years prior to your request, as well as identify institutional sources that have provided personal information about you.

There are certain types of information, such as information collected when we evaluate a claim or when the possibility of a lawsuit exists, that we are not required to provide.

### **If you disagree with our records**

To correct, amend, or delete information about you, send a written notice as described above explaining your request. Within 30 business days, we will either make the requested change or explain why we disagree. If a change is made, it will become part of the file. It will be included in any future disclosures to others and will be sent to:

- Anyone you designate who may have received the information during the previous two years.
- Any insurance support organization who may have received the information from us during the previous seven years, unless the information is no longer maintained.
- Any insurance support organization that provided the information that was corrected, amended, or deleted pursuant to your request.

If we disagree with you, you can provide us with a concise written statement explaining why you believe the information is wrong. This statement will become part of your file and will be included in any future disclosures of the disputed subject matter. Your statement will also be sent to the persons listed above.

### **PRIVACY NOTICE CHANGES**

We may modify this Privacy Notice from time to time. If we make changes, the most recent version date will appear at the bottom of the Privacy Notice.

### **HOW TO CONTACT US**

Our physical location is:

PEMCO Mutual Insurance Company  
1300 Dexter Ave. N.  
Seattle, WA 98109

Phone: 1-800-467-3626

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