

PRIVACY POLICY

Last Revised 12/1/23

Special Risk Managers of America (“SMRA”) and our affiliates, (collectively, “we”, “us”, “our”) provides this Privacy Notice (“Privacy Notice”) to help you understand what information about you we collect, why we collect it, and what we do with it. It applies to users of www.specialriskmanagers.com (the “Site(s)”) and any other websites, products, services, and applications (the “Service(s)”) to which this Privacy Notice is linked. This Privacy Notice does not govern information collected by any third party, including through any application or content that may be linked to, or accessible from, our Services.

What Personal Information We Collect

When you use our Services, we may collect several types of information from and about you, including information:

- by which you may be personally identified, including your name, e-mail address, and phone number.
- that is about you but does not individually identify you; and
- about your device, browser, and IP address to distinguish users, identify sessions, and manage traffic.
- **no personal information will be sold to a third party.**

How We Collect Personal Information

We collect information in the following ways:

Information that You Give Us

You may provide us information about yourself and your household when you buy or register a product or service with us, use our websites or other applications, send us an application, or claim form, or communicate with us. If the Service you obtained through AIA Holdings, Inc. was obtained through a third party (such as an insurance agent, bail bondsman, homebuilder, retail store, or employer), information may be provided to us by that third party on your behalf.

If you provide us with information about individuals other than yourself, you agree to obtain any consent required to share that person’s information under any applicable laws, rules, or regulations.

Information from Our Affiliates

We may obtain information about your transactions with our affiliates in accordance with applicable law.

Information from Third Parties

We may obtain some information about you from non-affiliated third parties. These third-party sources vary over time and by Service, but may include:

- Consumer reporting agencies.
- Third party service providers.
- Publicly available sources.
- Insurance agents and brokers.
- Social media; and

- Other third parties whom you have authorized to provide us information or as otherwise permitted by law.

Information Collected Automatically

As you use our Services, we (and other entities) automatically collect information relating to your interactions with us and our Sites, including browser type, IP address, pages visited and other activities on the Sites, device type, and time and date of visit, and other information we collect through the use of cookies and similar technology. AIA Holdings, Inc. uses Google Analytics and other third-party services to improve the performance of the Sites and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Sites, visit www.google.com/policies/privacy/partners, and to opt out of Google Analytics, visit tools.google.com/dlpage/gaoptout.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our websites.
- Flash Cookies. Certain features of our websites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Pages of our websites and emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

How We Use Personal Information

Generally, we use your personal information to provide you with the products and services that you request, offer you other products and services that we think might interest you, and to improve your overall experience with our Services. We may also use your personal information for any lawful purpose, including the following:

- To communicate with you about your account, business relationship, products, or services;
- To let you know about new features, products, or services that may be available to you;
- To bill you, process payments, and collect on amounts that you may owe us;
- To improve our products, services, sites, and operations;
- To personalize your experience while using our Services;
- To comply with the laws, rules, and regulations that apply to our business;
- To establish or defend our legal rights and responsibilities, or those of our affiliates, business partners, vendors, customers, or others; or
- With your consent, or as otherwise disclosed at the time information is collected.

How We Share Personal Information

We may share your personal information with:

- **Our affiliates.** Our subsidiaries and affiliates may provide a variety of products and services, including financial products and services (such as property and casualty insurance, life or health insurance, consumer banking, or securities brokerage, insurance agency or brokerage services), service contracts or extended warranties, professional employer organization services, business process outsourcing, among others.
- **Our vendors and service providers.** We utilize third party service providers, such as call center service providers; claims servicing providers and third-party administrators; software providers; professional advisors; and consumer reporting agencies who may provide products or services to you on our behalf. We may share your personal information with these third parties to conduct our business, provide and improve upon our Services, or engage in marketing or research activities.
- **Other insurance-related entities.** We may share personal information with third parties, such as other insurers, reinsurers, brokers, and third-party administrators in connection with our insurance-related Services and activities.
- **Distribution partners.** We may make personal information available to our distribution and marketing partners, including dealers, retailers, referral partners, sales agents, and others involved in the distribution, sales, or marketing of our Services or other products or services that we may co-market with third parties.
- **Governmental entities and parties involved in litigation.** We may share personal information with governmental entities and third parties involved in litigation or other dispute resolution to comply with applicable laws, rules, and regulations; protect our safety or privacy, or those of third parties; and establish or defend our legal rights or responsibilities.
- **Other third parties.** We may also share your personal information with other third parties, including credit bureaus and credit reporting agencies; healthcare providers, insurers, and networks; others involved in a claim; and any parties involved in a corporate sale, acquisition, merger, or other transfer of all or part of our assets.

We may aggregate or de-identify information collected by the Services in such a way that it is not capable of identifying you. Our use and disclosure of aggregated or de-identified information is not subject to any restrictions under this Privacy Notice, and we may disclose it to others without limitation for any purpose.

Changes to this Notice

We may update this privacy changes to our information handling practices. If we make any changes to this privacy notice, we will notify you by means of a notice on our website(s) and application(s) prior to the change becoming effective, and we will change the “last revised” date at the top of this page. We encourage you to periodically review this notice for the latest information on our privacy practices and handling of your personal information.

PRIVACY STATEMENT-CALIFORNIA

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of AIA HOLDINGS, INC. and ALLEGHENY CASUALTY COMPANY and its subsidiaries (collectively, “we,” “us,” or “our”) and applies solely to 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 other California privacy laws. 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 capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. 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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	YES
C. 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, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina	YES

	scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - 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.

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

- Directly from our agents or their clients. For example, from documents that our agents provide to us related to the services for which they engage us.
- Indirectly from our agents or their clients. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website (www.aisurety.com). For example, from submissions through our website portal or website usage details collected automatically.

- From third parties that interact with us in connection with the services we perform. For example, from government or private agencies.
- Social network information.
- Publicly available data bases.

Use of Personal Information

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

- To fulfill or meet the reason for which the information is provided. For example, to submit this information to our agents for underwriting insurance.
- To provide you with alerts, information, and other notices concerning our services.
- To carry out our obligations and enforce our rights arising from any contracts entered between you and us.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our agents or their clients or others.
- 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 is among the assets transferred.

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.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose and/or as required by the law or a court. 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.

In the preceding twelve (12) months, we may have disclosed the following categories of personal information for a business purpose [only the categories for which we state Yes above]:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category E: Biometric information.

Category G: Geolocation data.

Category I: Professional or employment-related information.

We disclose your personal information for a business purpose to the following parties:

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

In the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

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

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.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

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 providers 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, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
5. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
6. Comply with a legal obligation or process.
7. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

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

- Calling us at (818) 223-3308
- Visiting www.aiaSurety.com or email at privacy@aiaSurety.com.

Only you or a person registered with the California Secretary of State that you authorize 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 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. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. 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 notify you by email or through a notice on our website homepage. The date this Privacy Notice was last updated is identified at the bottom of this page. You are responsible for periodically visiting our website and this Privacy Notice to check for any changes.

Contact Information

If you have any questions or comments about this Privacy Notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, you may contact us via:

Phone: (818) 223-3308

Website: www.aiaSurety.com

Email: privacy@aiaSurety.com

Postal Address: AIA Holdings, Inc.

Attn: Compliance Department

PO Box 5600, Thousand Oaks, CA 91359