

Comparion Insurance Agency California Privacy Policy (Consumers)
Effective September 9, 2024

This California Privacy Policy supplements the general Comparion Insurance Agency Privacy Notice information that we provide at or before the point of information collection, at www.comparioninsurance.com/privacy-policy for California consumers, as this term is defined in the California Consumer Privacy Act of 2018 (“CCPA”) as amended. This Comparion Insurance Agency California Privacy Policy (“Policy”) is provided on behalf of Comparion Insurance Agency, LLC, a Liberty Mutual company, (“Comparion” or “we”, “us” and “our”). It describes the personal information we collect and how we use it. It also describes additional rights you may have under the CCPA. This Policy does not apply to employees or job applicants.

I. What Information Did Comparion Collect?

In the preceding twelve (12) months, Comparion collected the following categories of personal information listed below. The data Comparion collects varies based on your relationship to us.

Category	Examples
Identifiers	Real name, alias, postal address, online identifier, Internet Protocol address, email address, account name, Social Security Number, driver’s license number, or other similar identifiers.
Personal Information described in California Civil Code § 1798.80(e)	Name(s), signature, physical characteristics or description, telephone number, state identification card number, insurance policy number, education, bank account number, financial information, medical information, or health insurance information.
Protected Classification Characteristics	Age (40 years or older), race, color, 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, or veteran or military status.
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories and tendencies.
Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
Professional or employment related information	Current or past job history or performance evaluations.
Inferences drawn from other personal information	Profiles reflecting a person’s preferences, characteristics, psychological, trends, predispositions, behavior, and attitudes.
Risk Data	Accident, injury, and/or driving history; this may include data from consumer reporting agencies, such as motor vehicle records and loss history information, health data, or criminal convictions.
Claims Data	Information about previous and current claims, which may include information regarding health, criminal convictions, third party reports, or other personal information.
Transaction Data	Balances, payment histories, parties to transactions, information from consumer reports, and other data collected in relation to our provision of services.
Sensitive Data	As defined under the CCPA, as amended.

II. How Did Comparison Collect This Information?

In the preceding twelve (12) months, Comparison obtained personal information about California consumers from the following categories of sources:

- **Information you provide to us directly**, including for example, information provided in your insurance application or other forms and online via the auto quoting application, home quoting application, life quoting tools, and customer service;
- **Information we collect or receive from third parties**, including other insurers, brokers and/or insurance support organizations who you have communicated with about your policy or claim, insurance applications you have completed or that brokers have completed on your behalf, your business dealings with us and other companies including, but not limited to, your claims and payment history, transactions, limits and rates, information required for billing and payments to/from motor vehicle departments, anti-fraud databases, sanctions lists, court judgments and other databases, government agencies, open electoral register, advertising networks, data analytics providers, and data brokers;
- **Publicly available sources**; and/or
- **Liberty Mutual subsidiaries and affiliates.**

III. How Did Comparison Use This Information?

In the preceding twelve (12) months, Comparison used the following categories of data for the purposes listed below and may have disclosed this information to certain categories of third parties.

Business Purpose	Categories of Data	Disclosed to these Categories of Third Parties
Market, sell and provide insurance to California consumers	<ul style="list-style-type: none"> ▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Commercial Information ▪ Internet or other similar network activity ▪ Professional or employment related information ▪ Inferences drawn from other personal information ▪ Risk data ▪ Claims data 	<ul style="list-style-type: none"> ▪ Service Providers; ▪ Liberty Mutual affiliates and partners; ▪ Insurance support organizations; ▪ Brokers and agents; ▪ Government entities; ▪ Consumer reporting agencies; ▪ Advisors including law firms, accountants, auditors, and tax advisors; ▪ Insurers, re-insurers, and policy holders; ▪ Group policyholders (for reporting claims data or an audit); ▪ Advertising networks, data analytics providers, and social networks; ▪ Service providers, persons, organizations and affiliates for actuarial or research studies; and/or ▪ As permitted by law.
Day to Day Business and Insurance Operations	<ul style="list-style-type: none"> ▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Commercial Information 	<ul style="list-style-type: none"> ▪ Service Providers; ▪ Liberty Mutual affiliates and partners; ▪ Insurance support organizations; ▪ Brokers and agents; ▪ Government entities;

	<ul style="list-style-type: none"> ▪ Internet or other similar network activity ▪ Professional or employment related information ▪ Inferences drawn from other personal information ▪ Risk data 	<ul style="list-style-type: none"> ▪ Consumer reporting agencies; ▪ Advisors including law firms, accountants, auditors, and tax advisors; ▪ Insurers, re-insurers, and policy holders; ▪ Group policyholders (for reporting claims data or an audit); ▪ Advertising networks, data analytics providers, and social networks; ▪ Service providers, persons, organizations and affiliates for actuarial or research studies; and/or ▪ As permitted by law.
Security and Fraud Detection	<ul style="list-style-type: none"> ▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Commercial Information ▪ Internet or other similar network activity ▪ Professional or employment related information ▪ Inferences drawn from other personal information ▪ Risk data 	<ul style="list-style-type: none"> ▪ Service Providers; ▪ Liberty Mutual affiliates and partners; ▪ Insurance support organizations; ▪ Brokers and agents; ▪ Government entities; ▪ Consumer reporting agencies; ▪ Advisors including law firms, accountants, auditors, and tax advisors; ▪ Insurers, re-insurers, and policy holders; ▪ Group policyholders (for reporting claims data or an audit); ▪ Service providers, persons, organizations and affiliates for actuarial or research studies; and/or ▪ As permitted by law.
Regulatory and Legal Requirements	<ul style="list-style-type: none"> ▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Commercial Information ▪ Internet or other similar network activity ▪ Professional or employment related information ▪ Inferences drawn from other personal information ▪ Risk data 	<ul style="list-style-type: none"> ▪ Service Providers; ▪ Liberty Mutual affiliates and partners; ▪ Insurance support organizations; ▪ Brokers and agents; ▪ Government entities; ▪ Consumer reporting agencies; ▪ Advisors including law firms, accountants, auditors, and tax advisors; ▪ Insurers, re-insurers, and policy holders; ▪ Group policyholders (for reporting claims data or an audit); ▪ Advertising networks, data analytics providers, and social networks; ▪ Service providers, persons, organizations and affiliates for actuarial or research studies; and/or ▪ As permitted by law.
Improve Your Customer Experience and Our Products	<ul style="list-style-type: none"> ▪ Identifiers ▪ Personal Information ▪ Commercial Information ▪ Internet or other similar network activity 	<ul style="list-style-type: none"> ▪ Service Providers; ▪ Liberty Mutual affiliates and partners; ▪ Insurance support organizations; ▪ Brokers and agents; ▪ Advisors including law firms, accountants, auditors, and tax advisors;

	<ul style="list-style-type: none"> ▪ Professional or employment related information ▪ Inferences drawn from other personal information ▪ Risk data 	<ul style="list-style-type: none"> ▪ Insurers, re-insurers, and policy holders; ▪ Group policyholders (for reporting claims data or an audit); ▪ Advertising networks, data analytics providers, and social networks; ▪ Service providers, persons, organizations and affiliates for actuarial or research studies; and/or ▪ As permitted by law.
Customer service and technical support	<ul style="list-style-type: none"> ▪ Identifiers ▪ Personal Information ▪ Commercial Information ▪ Internet or other similar network activity ▪ Professional or employment related information ▪ Inferences drawn from other personal information ▪ Risk data 	<ul style="list-style-type: none"> ▪ Service Providers; ▪ Liberty Mutual affiliates and partners; ▪ Insurance support organizations; ▪ Brokers and agents; ▪ Advisors including law firms, accountants, auditors, and tax advisors; ▪ Insurers, re-insurers, and policy holders; ▪ Group policyholders (for reporting claims data or an audit); ▪ Service providers, persons, organizations and affiliates for actuarial or research studies; and/or ▪ As permitted by law.
Cross-Context Behavioral Advertising	<ul style="list-style-type: none"> ▪ Identifiers ▪ IP address ▪ Internet or other similar network activity 	<ul style="list-style-type: none"> ▪ We share this information with service providers such as search engines and social media platforms

IV. Categories of Information Sold or Shared

In the last 12 months, Comparison did not sell your data as defined by the CCPA, as amended. If you visit www.comparisoninsurance.com, we may share (as defined under CCPA) some personal information (e.g. IP address, device ID) for cross-context behavioral advertising. This data is shared with other websites and social media platforms to display targeted advertisements to you.

V. Your Right To Access, Delete and Correct Your Information

The CCPA, as amended, provides California consumers with specific rights to access, delete or correct personal information. These rights are subject to certain exceptions, including for example, if the personal information was collected pursuant to Gramm-Leach-Bliley, the privacy law regulating insurance companies. Our response to your exercise of rights may be limited as permitted under law.

A. Access or Deletion

You may have the right to request that Comparison disclose certain information to you about our collection and use of your personal information, including a copy of the personal information we have collected. You have the right to know what personal information we collected about you, including the categories of information, the categories of sources from which the information is collected, the business purpose for use or sharing of the information, the categories of third parties to whom we disclosed information, and the specific pieces of information we have collected about you.

You also may have the right to request that Comparion delete personal information that Comparion collected from you, subject to certain exceptions. Once Comparion receives and verifies your request, we will delete your personal information from our systems, unless an exception applies. If applicable, we will also notify third parties, service providers and contractors with whom we may have shared your data of your request for deletion.

To the extent Comparion has your Social Security Number, Driver's License Number or any other government-issued identification information for you, we do not provide access to this information pursuant to best security practices, CCPA as amended, and any related regulations.

B. Correction

You may have the right to request that Comparion correct inaccurate personal information, taking into account the nature of the personal information and the purposes of maintaining your personal information. Upon verifying the validity of a verifiable consumer correction request, we will use commercially reasonable efforts to correct your personal information as requested.

Comparion may reject a request for correction if we are unable to verify your identity or if we determine that the contested personal information is more likely than not accurate based on the totality of the circumstances. If necessary, we may request that you provide documentation that the personal information is inaccurate.

C. How to Make an Access, Deletion, or Correction Request

To exercise the access, deletion, or correction rights described above, a verifiable consumer request may be made to Comparion by either:

- Calling: 800-344-0197
- Online: www.libertymutualgroup.com/privacy-policy/data-request
- Mail: Comparion Insurance Agency, LLC
175 Berkeley St.
Boston, MA 02116
Attn: Privacy Office

Limited personal information will be required for identity verification purposes. The specific elements may vary depending on the nature of your relationship with Comparion, but will typically include name, address, phone number, date of birth, last four of your social security number and a description of your relationship with Comparion.

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 deletion twice within a twelve (12) month period. The verifiable consumer request must provide sufficient information that allows Comparion to reasonably verify that you are the person about whom Comparion collected personal information or an authorized representative of such person; and describe your request with sufficient detail that allows Comparion to properly understand, evaluate, and respond to it. If Comparion is unable to verify you based on the information you have provided and the information contained in our systems, Comparion will advise you that we cannot complete your request based on inability to verify you.

A California consumer may use an authorized agent to submit a right to know request, a request to delete, or a request to correct. Comparion may require the authorized agent to provide proof that the consumer gave the agent signed permission to submit the request. In addition, the California consumer may be required to verify their own identity with Comparion and we may ask you to directly confirm that you provided the authorized agent permission to submit the request.

We may deny a request from an agent that does not submit proof that they have been authorized by the California consumer to act on their behalf. Such requirements, however, will not apply where a California consumer has provided the authorized agent with power of attorney pursuant to Cal. Prob. Code Sections 4121 to 4130. For any questions regarding an authorized agent request, please contact the Comparison Privacy Office as described in the contact section below.

D. Response Timing

Comparison endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If more time is needed, Comparison will inform you of the reason and extension period in writing.

If Comparison is unable to fulfill your request, you will be provided with the reason that the request cannot be completed.

We may deliver the personal information to you electronically, or by mail at your option. If electronically, then we will deliver the information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information from one entity to another without hindrance.

VI. Opt-Out Rights

A. Rights to opt in and out of information selling/sharing

Comparison does not sell the personal information of California consumers.

Comparison shares your personal information when you visit a Comparison website. The California privacy law defines sharing as “communicating orally, in writing, or by electronic or other means, a consumer’s personal information . . . to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.” For example, this occurs when you visit a Comparison website. Cookies or pixels are deployed that then allow us to show you targeted advertisements when you visit other websites or social media platforms.

California consumers may opt-out of sharing personal data for cross-context behavioral advertising. If you opt-out, this means for example that after you visit comparisoninsurance.com you will not see a targeted, personalized ad on a different website or social media platform. Comparison will accept any of the three options listed below as a valid request to opt-out of sharing.

- (1) Use the Global Privacy Control (“GPC”). This is an opt-out at the browser and device level. For example, if you turn on GPC on your laptop, you have opt-ed out for data collected while on your laptop but not if you visit our website on your phone. You need to turn on GPC for each device. Click [here](#) to learn how to turn on GPC. If you turn on GPC, your opt-out of sharing is accepted automatically.
- (2) Click on the Do Not Sell Or Share My Personal Information Link that displays at the bottom of our website. This is an opt-out at the browser and device level. If you visit our website from your laptop and click on the link to opt-out, we know when you are on that device that you have opted-out. When you visit the device on your phone, you will need to click on the link again to opt-out from that device.

OR

- (3) If you provided Comparison with your email address during the online quoting process, you can opt-out of sharing by completing a form. Click on lmi.co/caprivacychoices to opt out.

Comparison will not require you to create an account to exercise your opt-out rights. We may ask you for additional information necessary to complete the opt-out request. We may deny an opt-out request if we have a good-faith, reasonable, and documented belief the request is fraudulent. Upon receipt of your request, Comparison will not share your personal information with third parties for cross-context advertising within fifteen (15) business days of receiving your request. An authorized agent may submit an opt-out request on your behalf if the agent provides a copy of your signed permission to submit a request on your behalf.

B. Right to Limit the Use of Sensitive Information

California consumers have the right to request Comparison limit the use and disclosure of their sensitive information to that which is necessary to perform the services reasonably expected by an average consumer who requests these services, with some identified exceptions. For example, Comparison is allowed to use sensitive data (even if you opt-out):

- To perform the services or provide the goods requested by you;
- If it is not used to infer characteristics about you;
- To detect security incidents;
- To resist malicious, fraudulent, deceptive or illegal actions directed at Comparison;
- To ensure the physical safety of a person;
- For short-term and transient use;
- To perform services on behalf of Comparison; or
- To verify or maintain the quality of services provided.

To submit a request to limit the use of sensitive data, click on lmi.co/caprivacychoices. You may also submit a request to limit by:

Calling: 800-344-0197
Email: Privacy@libertymutual.com
Mail: Comparison Insurance Agency, LLC
175 Berkeley St.
Boston, MA 02116
Attn: Privacy Office

Upon receiving your request to limit, Comparison may ask you for additional necessary information to complete your request. A request to limit may be denied if we have a good-faith and reasonable belief that the request is fraudulent. Comparison will process your request within fifteen (15) business days of receiving your request. You may use an authorized agent to submit a request on your behalf if the authorized agent provides a copy of your signed permission authorizing the agent to submit a request on your behalf.

No account needed

You do not need to create an account with Comparison to exercise your rights. Comparison will only use personal information provided in a request to review and comply with the request.

No discrimination

You have the right not to be discriminated against for exercising any of your data privacy rights under California law. Unless permitted by law, Comparison will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts, other benefits, or imposing penalties;

- Provide you a different level or quality of goods or services; and/or
- Suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

VII. How to Contact Us

You can submit requests, seek additional information, or obtain a copy of our Privacy Policy in an alternative format by either:

Calling: 800-344-0197
Email: Privacy@libertymutual.com
Online: www.libertymutualgroup.com/privacy-policy/data-request
lmi.co/caprivacychoices
Mail: Comparion Insurance Agency, LLC
175 Berkeley St.
Boston, MA 02116
Attn: Privacy Office

VIII. Changes to this Policy

Comparion reserves the right to amend this Policy at any time. The “Last Updated” date at the bottom of this Policy indicates when Comparion last revised this Policy. Any changes will become effective when Comparion posts the revised Privacy Policy.

For information about the privacy practices of Liberty Mutual Insurance Company and Safeco Insurance, please visit lmi.co/privacy.