

**Comparion Insurance Agency Privacy Notice – California**  
Effective September 9, 2024

Comparion Insurance Agency, LLC, a Liberty Mutual company, (“Comparion” or “we”, “us” and “our”) is an insurance agency that helps individuals find the right insurance products from insurance carriers. This Comparion Insurance Agency Privacy Notice (“Notice”) applies to you if you are a **California resident and** are contacting us to learn about insurance products or to buy insurance for yourself (for example, auto insurance). In this Notice, we explain how we gather, use, share, and protect your data.

**What Personal Data Do We Collect?**

The types of personal data we gather and share depend on both the product and your relationship to us. The data we gather can include your Social Security Number, income, transaction data such as account balances and payment history, and data from consumer reports. It may also include data gathered when you apply for insurance services or resulting from other contacts with you. It may also include:

- **Identifiers**, including 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, or other similar identifiers;
- **Personal data**, such as your name, signature, Social Security Number, physical characteristics or description, address, telephone number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, financial data, precise geolocation, medical data, or health insurance data;
- **Protected classification characteristics described in California Civil Code § 1798.80(e)**, including age, 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 data**, including 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**, including browsing history, search history, data about a consumer’s interaction with a website, application, or advertisement;
- **Professional or employment related data**, including current or past job history;
- **Inferences drawn from other personal data**, such as a profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes;
- **Risk data**, including data about your driving and/or accident history; this may include data from consumer reporting agencies, such as your motor vehicle records, and loss history data, health data, or criminal convictions;
- **Claims data**, including data about your previous and current claims, which may include data regarding your health, criminal convictions, third party reports, or other personal data.
- **Sensitive Data**, as defined under the California Consumer Privacy Act of 2018 (“CCPA”), as amended.

For information about the types of personal data we have gathered in the past twelve months, please see the [California Privacy Policy \(Consumers\)](#).

**How do you gather my data?**

We gather your personal data <b>directly from you</b> . For example, you provide us with data when you:	We also gather your personal data <b>from other people</b> . For example:
▪ ask about or buy insurance	▪ your insurance company
▪ pay your policy	▪ your employer, association, or business (if you are insured through them)
▪ visit our websites, call us, or visit our office	▪ Liberty Mutual affiliates or other insurance companies about your transactions with them

	<ul style="list-style-type: none"> <li>▪ consumer reporting agencies, Motor Vehicle Departments and inspection services, to gather your credit history, driving record, claims history, or value and condition of your property</li> </ul>
	<ul style="list-style-type: none"> <li>▪ other public directories and sources</li> </ul>
	<ul style="list-style-type: none"> <li>▪ 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</li> </ul>
	<ul style="list-style-type: none"> <li>▪ other third parties who take out a policy and are required to provide your data, such as when you are named as a beneficiary or where a family member has taken out a policy that requires your personal data</li> </ul>

Organizations that share data with us may keep it and disclose it to others as permitted by law. For data about how we have gathered personal data in the past twelve months, please see the [California Privacy Policy \(Consumers\)](#).

### How Do We Use Your Personal Data?

Comparion uses your data to offer you products and services and as otherwise provided in this notice. We may use your data and the data of our former customers for our business and other compatible purposes. Our business purposes include, for example:

<b><u>Business Purpose</u></b>	<b><u>Data Categories</u></b>	<b><u>Do we share or sell your information as defined by CPRA</u></b>
<b>Market, sell and provide insurance.</b> This includes, for example: <ul style="list-style-type: none"> <li>• determining your eligibility for a quote;</li> <li>• confirming your identity and servicing your policy;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	No
<b>Day to Day Business and Insurance Operations.</b> This includes, for example: <ul style="list-style-type: none"> <li>• creating, maintaining, customizing, and securing accounts;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> </ul>	No.

<u>Business Purpose</u>	<u>Data Categories</u>	<u>Do we share or sell your information as defined by CPRA</u>
<ul style="list-style-type: none"> <li>• supporting day-to-day business and insurance related functions;</li> <li>• doing internal research for technology and development;</li> <li>• marketing products and services;</li> <li>• conducting audits related to a current contact with a consumer and other transactions;</li> <li>• as described at or before the point of gathering personal data or with your authorization;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> </ul>	
<p><b>Security and Fraud Detection.</b> This includes, for example:</p> <ul style="list-style-type: none"> <li>▪ detecting security issues;</li> <li>▪ protecting against fraud or illegal activity, and to comply with regulatory and law enforcement authorities;</li> <li>▪ managing risk and securing our systems, assets, infrastructure, and premises;</li> <li>▪ help to ensure the safety and security of Comparison staff, assets, and resources, which may include physical and virtual access controls and access rights management;</li> <li>▪ supervisory controls and other monitoring and reviews, as permitted by law; and emergency and business continuity management;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> </ul>	No.
<p><b>Regulatory and Legal Requirements.</b> This includes for example:</p> <ul style="list-style-type: none"> <li>▪ controls and access rights management;</li> <li>▪ to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution,</li> </ul>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> </ul>	No.

<b><u>Business Purpose</u></b>	<b><u>Data Categories</u></b>	<b><u>Do we share or sell your information as defined by CPRA</u></b>
<p>or other sale or transfer of some or all of Comparion’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Comparion is among the assets transferred;</p> <ul style="list-style-type: none"> <li>▪ exercising and defending our legal rights and positions;</li> <li>▪ to meet Comparion contract obligations;</li> <li>▪ to respond to law enforcement requests as required by applicable law, court order, or governmental regulations;</li> <li>▪ as otherwise permitted by law;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> </ul>	
<p><b>Improve Your Customer Experience and Offering of Products.</b> This includes, for example:</p> <ul style="list-style-type: none"> <li>• improve your customer experience, offering of products, and service;</li> <li>• to provide support, personalize, and develop our website, products, and services;</li> <li>• offer new products and services;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> </ul>	No.
<p><b>Customer service and technical support.</b> This includes, for example:</p> <ul style="list-style-type: none"> <li>• answer questions and provide notifications;</li> <li>• provide customer and technical support.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> </ul>	No.
<p><b>Cross-Context Behavioral Advertising</b></p>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ IP address</li> <li>▪ Internet or other similar network activity</li> </ul>	We share this information with service providers such as search engines and social media platforms

Comparion will not collect additional categories of personal information or use the personal information we collected for materially unrelated, or incompatible purposes without updating our Notice.

## Do We Disclose Your Personal Data?

Comparion does not sell your personal data as defined by California law.

Comparion shares your personal data as disclosed above. 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 Comparion website. Cookies or pixels are deployed that then allow us to show you targeted advertisements when you visit other websites or social media platforms. You have the right to opt-out of this type of sharing and you may learn more about those rights at [lmi.co/caprivacychoices](https://lmi.co/caprivacychoices).

This type of sharing is different from disclosing personal information to other entities to perform a service. How we disclose data to these types of entities is set forth below.

Comparion may disclose personal data with affiliated and non-affiliated third parties, including:

- Liberty Mutual and its affiliates and partners;
- Service Providers;
- Insurance support organizations;
- Brokers and agents;
- Public entities (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, and fraud prevention agencies);
- 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);
- Persons, organizations, affiliates or service providers conducting actuarial or research studies; and
- As permitted by law.

We may also disclose data with other companies that provide marketing services on our behalf or as part of a joint marketing agreement for products offered by Comparion. We will not disclose your personal data with others for their own marketing purposes.

We may also disclose data about our transactions and experiences with you to our affiliates.

Comparion may disclose the following categories of personal data as needed for business purposes:

Identifiers	Personal Data
Protected Classification Characteristics	Commercial Data
Internet or other similar network activity	Professional, employment, and education data
Inferences drawn from personal data	Risk Data
Claims Data	

For information about how we have shared personal data in the past twelve months, please see the [California Privacy Policy \(Consumers\)](#).

## How Do We Keep your Personal Data Safe?

We maintain physical, electronic, and administrative safeguards created to protect your data from unauthorized access. Our employees and agents are authorized to access your data only for legitimate business purposes.

**How Long Does Comparion Retain Each Category of Personal Data?** We retain your information in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law. For example, we may have a legal obligation to retain information relating to your policies. We will delete your data once the legal obligation expires or after the period of time specified in our records retention policies. The period of retention is subject to our review and alteration.

## What Rights Do I Have to Learn More About My Personal Data?

You may have rights under California laws to learn more about our privacy practices.

For example, under the California Insurance Code, you may request a copy of certain data about you to review its completeness and accuracy. You must make this request in writing by contacting us as indicated below. We have thirty business days after receiving your request to send the data to you.

To the extent required by law, we will also share the name and address of any consumer reporting agency from which we have received information about you. Some data we are not required to share.

If you believe the data we have about you is incorrect, you may notify us in writing of what you would like to correct and why. We will respond within thirty business days.

If we agree, we will change our records. We will send the change to any organization that has received the inaccurate information from us. It will also be included in any later disclosures to others.

If we disagree, we will tell you why. You can write us with a short statement explaining why you believe that the data is incorrect. This will become part of the file. We will also send it to any persons that have received the disputed information from us. It will also be included in any later disclosures to others.

You may have additional rights under other California laws. For more information about these rights, please see the [California Privacy Policy \(Consumers\)](#). If you cannot access the link, please contact us.

## How to Contact Us:

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

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

## Who is providing this Notice?

This Privacy Notice is provided on behalf of Comparion Insurance Agency, LLC, a Liberty Mutual company.

For information about the privacy practices of Liberty Mutual Insurance Company and Safeco Insurance, please visit [lmi.co/privacy](http://lmi.co/privacy).