



## CCPA Privacy Notice for California Residents

**Effective Date:** 06/01/2020

**Last Reviewed Date:** 06/01/2021

This California Consumer Privacy Act (“CCPA”) Privacy Notice for California Residents is provided on behalf of United Heritage Financial Group and United Heritage Life Insurance Company (collectively “United Heritage”), herein “we,” “us,” and “our.” This notice supplements the information contained in our general privacy notice and applies solely to personal information of California residents (defined by the CCPA as “consumers,” also referenced herein as “you”) collected by us to the extent the personal information is subject to the CCPA. The CCPA has several exemptions including, personal information that is collected, processed, or disclosed pursuant to (i) the federal Gramm-Leach Bliley Act (“GLBA”) and implementing regulations, (ii) the California Financial Information Privacy Act, and (iii) the Health Insurance Portability and Accountability Act (“HIPAA”).

For a description of our general privacy practices, please go to <https://www.unitedheritage.com/index.php?r=site%2Fprivacy>

### Personal Information We Collect

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information”). We do not sell consumers’ Personal Information.

We have collected the following categories of personal information from consumers in the preceding twelve months (some categories overlap):

Category	Examples	Collected
A. Identifiers	Real name, date of birth, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account number, social security number, driver’s license number, and other similar identifiers	YES
B. Categories of Personal Information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))	Name, signature, social security number, physical characteristics or description, address, telephone number, driver’s license or state identification card number, insurance policy or annuity contract number, education, employment, employment history, bank account number, other financial information (including premiums, balances, transaction history, payment history, policy or account values), medical information (including medical history, medical records, medical questionnaires, information regarding physical, mental, and behavioral health, pharmacy records, attending physician information, and data collected in relation to our provision of insurance services), and product information (including beneficiary and/or assignee information, additional insured information, ownership arrangements, and claims history)	YES
C. Characteristics of protected classifications under California or federal law	Age, national origin, citizenship, marital status, medical conditions, physical or mental disability, sex (including pregnancy, childbirth, and/or related medical conditions), gender, and military or veteran status	YES
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies	YES
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, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data	NO
F. Internet or other similar network activity	Browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, or advertisement	YES
G. Geolocation data	Physical location or movements	NO

H. Sensory data	Audio, electronic, visual, or similar information, including recordings of phone calls or messages left on a phone system, photographs, and videos from a surveillance system	YES
I. Professional or employment-related information	Employer name, current or past employment history, positions held, salary information, earnings, professional related information, disciplinary records, employment applications, resumes, and background checks	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, and student disciplinary records	NO
K. Inferences drawn from other personal information	Inferences drawn from any personal information collected and used to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	YES

### **Sources from Which We Collect Personal Information**

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

- Directly from the Consumer: As a result of the consumer's request to be contacted by us, completion of an application or administrative form, request for a change, filing of a claim, request for client services communication, or otherwise interacting with us or our website;
- From our Insurance Producer: As a result of communications a consumer has with our insurance producer in relation to an application, policy, contract, or claim, and information our insurance producer provides to us in relation to a consumer's application, policy, contract, or claim;
- From Third Parties: As permitted by law, such as service providers that interact with us in connection with the services a consumer requests of us, other insurance companies and reinsurers, marketing companies, and anti-fraud databases;
- From Third Parties Authorized by the Consumer: Such as medical providers;
- Publicly available sources;
- Prior and current employers, employment agencies and education institutions;
- Referrals;
- Inferences derived from other Personal Information.

### **Our Business Purposes for Collecting Personal Information**

We collect the categories of personal information identified above for the following business or commercial purposes:

- To operate, manage, and maintain our business, as required or permitted by law, including to market and sell insurance products and services, to provide insurance products and services requested by consumers or reasonably anticipated within the context of our ongoing business relationship with a consumer, or to otherwise perform a contract between us and a consumer;
- To respond to consumer inquiries, and provide notifications to consumers;
- To achieve the purpose for which the information was collected, such as underwriting, reinsurance, policy services, consumer information verification, claims administration, and processing of requests, payments, and transactions;
- To perform necessary and appropriate internal functions, such as accounting, auditing, refining business processes, developing or improving our website, products, and services, evaluating customer service interactions, resolving complaints, product development, and records maintenance;
- To detect security incidents, to protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity, to conduct internal investigations, to help maintain and improve the safety, security, and integrity of our website, information systems, databases, and other technology assets;
- To prevent and detect fraud, comply with a legal obligation, verify identity, defend legal claims, assist with legal processes such as investigations, and regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations;
- To determine eligibility for contracting, appointment, or employment.

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.

## **We Do Not Sell Personal Information**

We do not sell consumers' Personal Information.

## **Categories of Personal Information Disclosed for a Business Purpose**

We have disclosed the following categories of personal information to third parties for a business purpose in the preceding 12 months:

- Identifiers
- Categories of Personal Information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e))
- Characteristics of protected classifications under California or federal law
- Commercial information
- Internet or other similar network activity
- Sensory data
- Professional or employment- related information
- Inferences drawn from other personal information.

We may disclose any of the above categories of personal information with the following categories of third parties in connection with performance of our services, and for our business operations, as permitted or required by applicable law:

- Parties to whom you have directed or authorized our disclosure
- Insurance support organizations and rating agencies
- Public entities and institutions (including regulatory and quasi-regulatory authorities, insurance regulators, government authorities, and others as permitted or required by law)
- Service providers, in relation to the performance of our services and for our business functions, including:
  - financial service providers such as independent insurance agents, insurers, and reinsurers
  - underwriting service providers
  - information technology service providers
  - data analysis service providers
  - legal, accounting and auditing service providers
  - administrative service providers
  - security service providers

We do not sell consumer's Personal Information, including Personal Information of minors under 16 years of age.

## **California Consumer Rights Under the CCPA**

When it applies, the CCPA provides consumers with specific rights regarding personal information. Our response to a consumer's exercise of rights may be limited as permitted under law. This section describes consumers' CCPA rights and explains how to exercise those rights.

### **I. Right to Know**

Consumers have the right to request that we disclose certain information to them about our collection, use, disclosure, and sale of their personal information over the past 12 months.

- Request to Know Categories of Personal Information - Once we receive and confirm a verifiable consumer request, we will disclose to the consumer:
  - The categories of personal information we have collected about the consumer in the preceding 12 months;
  - The categories of sources from which the personal information was collected;
  - Our business or commercial purpose for collecting that personal information;
  - The categories of third parties with whom we share personal information;
  - The categories of personal information about the consumer that we disclosed for a business purpose in the preceding 12 months, and for each category identified, the categories of third parties to whom that particular category of personal information was disclosed.
- Request to Know Specific Pieces of Personal Information - Once we receive and confirm a verifiable consumer request, we will disclose to the consumer the specific pieces of personal information we have collected about the consumer.

### **II. Right to Delete**

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

### **III. Right to Opt-Out of the Sale of Personal Information**

Consumers have the right to opt -out of the sale of their personal information by a business. **We do not sell the personal information of consumers.**

### **IV. Right to Non-Discrimination**

Consumers have the right not to receive discriminatory treatment for the exercise of their privacy rights conferred by the CCPA. We will not discriminate against consumers for exercising their rights under CCPA.

### **Exercising CCPA Rights**

To exercise the rights described above, please submit a verifiable consumer request to us using one of the following methods:

1. Call our toll-free number, 1-800-657-6351 ext. 4000, and instruct us to:
  - Mail our CCPA Consumer Request Form to you for you to complete and mail back to us; or
  - Email our CCPA Consumer Request Form to you for you to complete and sign electronically.
2. Visit our website at <https://www.unitedheritage.com/index.php?r=site%2Fccpa> to print our CCPA Consumer Request form, complete the form, and mail it back to us.

### **Who May Make a Verifiable Consumer Request**

Only the consumer or someone legally authorized to act on the consumer's behalf may make a verifiable consumer request related to the consumer's personal information. A parent or guardian may also make a verifiable consumer request on behalf of a minor child (a consumer who is less than 13 years of age).

An authorized agent may make a verifiable consumer request on the consumer's behalf by providing us with the consumer's signed permission for the authorized agent to do so. A consumer may grant such permission by using our CCPA Authorized Agent Affidavit form. We may also require that the consumer verify his/her own identity directly with us and/or directly confirm with us that s/he provided the authorized agent permission to submit the request. These requirements do not apply when a consumer has provided the authorized agent with an appropriate power of attorney and we receive a copy of that power of attorney. We may deny a request from an authorized agent who does not submit proof that s/he has been authorized by the consumer to act on the consumer's behalf.

### **What is Required in a Verifiable Consumer Request**

A verifiable consumer request must include enough information that allows us to reasonably verify that the consumer whose personal information is the subject of the request is the consumer about whom we have collected personal information. We will attempt to match data provided in the verifiable consumer request to data that we maintain. Specifically, we will ask for personal information, such as name, email address, telephone number, mailing address, the consumer's relationship to us, and associated policy numbers. If necessary, we may request additional information on the consumer for identity verification.

We must also be able to reasonably verify that the requestor of a verifiable consumer request has the authority to make the request, by verifying that the requestor is the consumer whose personal information is the subject of the request, or is the consumer's parent, guardian, or authorized agent. We will require the requestor to sign a declaration of identity under penalty of perjury, and we may use a third-party identity verification service.

A verifiable consumer request must provide sufficient information that allows us to properly understand, evaluate and respond to the request. We cannot respond to a request if we cannot verify the consumer's identity or the requestor's authority to make the request, and confirm that the personal information maintained by us relates to the consumer. If we deny a request, we will state the reason in our response. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request and for security and fraud prevention purposes. Making a verifiable consumer request does not require creation of an account with us.

### **Verifiable Consumer Request Response and Timing**

We will confirm receipt of a verifiable consumer request within 10 business days of receipt, and upon verification, provide a response within 45 calendar days of receipt. If we require more time, we will inform the requestor of the reason and extension period in writing (up to a maximum of 90 calendar days from the day of receipt). We will deliver our written response by mail or electronically, at the requestor's option. For data portability requests provided electronically, we will select a format that is readily useable and should allow for the information to be transmitted from one entity to another entity without hindrance. 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.

We do not charge a fee to process or respond to a verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will communicate why we made that decision and provide a cost estimate before completing the request. A consumer, or the consumer's parent, guardian, or authorized agent may submit an Access to Specific Information Request (Request to Know) up to two times within a 12-month period.

#### **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. Continued use of our website following the posting of changes constitutes acceptance of such changes.

#### **Notice for Consumers with Disabilities**

We are committed to providing consumer with disabilities with the same level of access to this privacy notice that is available to consumers without disabilities. Consumers with a disability may access this notice in an alternative format here: [www.unitedheritage.com/index.php?r=site%2Fccpa](http://www.unitedheritage.com/index.php?r=site%2Fccpa). If you need further assistance, please contact 1-800-657-6351 ext. 4000.

#### **Contact for More Information**

For further information about Personal Information we collect, your rights under the CCPA, and how to exercise those rights, please do not hesitate to contact us at:

Toll Free Phone: 1-800-657-6351 ext. 4000

Online: <https://www.unitedheritage.com/index.php?r=site%2Fcontact>

Address: PO Box 7777, Meridian, Idaho 83680-7777

Email: [heritage@unitedheritage.com](mailto:heritage@unitedheritage.com)