QBE NORTH AMERICA ONLINE PRIVACY STATEMENT



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QBE NORTH AMERICA ONLINE PRIVACY STATEMENT

Your Privacy

QBE North America and its affiliate companies ("QBENA") respect your privacy and are committed to protecting it. This Online Privacy Statement outlines our privacy practices – describing the data we collect when you interact with this website, when you use this website to apply for an insurance product, and once you become a policyholder. We provide details on how the data is used, and who we share it with. By accessing or using this website, you agree to the terms of this Statement.

QBENA's current customers may also receive a short form privacy notice with their policy. That notice may be read together with this Online Privacy Statement to more fully describe our privacy practices and your privacy rights based on your interactions with us.



INFORMATION WE COLLECT A

QBENA collects personal and other information about you. Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you.

The type and extent of personal information collected about you while on this website will depend on your interactions. For example, if you simply browse through our product descriptions, QBENA may store cookies on your browser. On the other hand, if you enroll in any of our self-service portals for policyholders, some personal information will be collected. The collection of personal information helps us personalize and continually improve your experience.

Self-Service Portal

QBENA's self-service portal allows you to register for access to your homeowner's and renter's insurance policy and billing details. We collect your policy number, name, address, date of birth and email for authentication purposes. We may also collect information about your transactions and experiences with us and others, such as your payment history, claims history, coverage details, account balances, and billing information.

During the quoting, application, or claims handling processes (by phone, mobile application, email or any other means) examples of information you may provide to us include your name, address, phone number, email address, Social Security number, driver's license number, and date of birth. QBENA protects your personal information from unauthorized access and use through security measures that comply with federal and state law. These measures include physical, technical and administrative safeguards applicable to computer systems, files and buildings.

Social Security Numbers A

QBENA's internal policies and procedures impose a number of standards to protect confidentiality of Social Security numbers, including:

- requesting Social Security numbers only when needed to comply with federal or state law, or to administer transactions.
- sharing Social Security numbers with third parties *only* for legitimate business purposes in accordance with applicable laws and regulations.
- storing, transmitting and disposing of Social Security numbers in accordance with company information protection standards.
- limiting employee access to Social Security numbers to those whose job duties require it.

Voluntary Online Activity Resulting in Collection of Pl	
Applying for insurance*	
Paying insurance premiums	
Filing a claim	
Providing employment information	
Providing us your contact information	
*May include information collected from other sources such as credit bureaus	

Types of PI Collected from Policyholders and Policy Applicants
Social Security Number
Payment history
Purchase history
Credit-based insurance scores
Insurance claim history

If you provided us your email address, we may use it from time to time to notify you of new services, special offers, or to confirm transactions. If you do not wish to be contacted by email for non-policy related communications, you may unsubscribe by following the instructions at the bottom of any email you receive.

Information collected by automated technologies .

Cookies are small pieces of information that websites can store on your computer. By accessing our website or using our online applications, you agree to cookies being stored on your browser or device. Most bowsers can be configured to accept or reject cookies, or to deliver notifications when a cookie is being sent. Options available may vary by browser. The functionality of our website and apps may be affected if cookies are blocked or rejected. For example, disabling cookies may require you to repeatedly enter information to request services.

Children and minors

QBENA's website is not intended for minors, and QBENA makes no effort to collect personal information from children. If we learn that we have inadvertently collected such information, we will take steps to delete it as soon as

possible. Please direct questions or concerns about QBENA's information collection practices to Privacy.US-BOX@us.qbe.com.

Biometric data

QBENA does not collect biometric data from current or prospective policyholders, nor do we collect biometric data from this website. QBENA does collect limited biometric data from its officers and follows all requirements set forth under state and federal law for the collection, storage and retention of biometric data.

HOW WE USE YOUR INFORMATION A

From Voluntary Use of this Website
To respond to questions or suggestions
To fulfill your online payment requests
To improve the quality of your visits to our site
To send offers or information about our products or services that may interest you

From Policyholders and Policy Applicants
To underwrite and rate policies and accounts
To confirm your identity and service your policies and accounts
To process claims
To administer accurate billing services
To protect against fraud and unauthorized transactions
To enhance customer experience and improve products and services, which may include the use of data analytics*
To perform activities required or as permitted by law.

^{*} QBENA will employ best efforts to remove all personally identifiable information used for data analytics purposes to ensure data is de-identified and is no longer personal information.

SHARING YOUR INFORMATION **A**

Within QBE

QBENA employees may access customer information for business purposes only. Access to your personal information is restricted to those employees who need it in order to provide services to you. Employees who have access to personal information are required to protect it and keep it confidential. We maintain physical, electronic and procedural safeguards that comply with state and federal law to guard your personal information. We may share your personal information with and among other QBE-affiliated companies listed on this notice.

With service providers .

Personal information may be shared with service providers who perform services on our behalf for specific business purposes. QBENA carefully chooses service providers to help us provide quality insurance services to you, and we are careful to protect your privacy when we share information with them. We emphasize to our service providers the importance of complying with strict standards regarding security and confidentiality of your information. They are not

permitted to sell any customer information we share with them to any other party, and they are only permitted to share information with third parties for specific business purposes related to servicing policies.

Common Business Purposes for QBENA to Share PI with Service Providers			
Transaction assistance, such as handling claims and servicing policies	Providing services that support online activities, such as tracking technologies		
Credit Reporting	Providing technology services and enhancing security, privacy, and fraud protections		
Payment processing	Providing data analytics services solely for QBE business purposes		

With third parties

Sharing of personal information with third parties is permitted only in limited circumstances. QBENA or its service providers may disclose personal information to third parties for reasons including:

- > To allow QBENA's service providers to carry out business functions related to servicing policies, such as sharing your information with health providers for billing verification
- In connection with corporate transactions, such as mergers or sale of company assets
- > When QBE is required by law to disclose information about you to nonaffiliated third parties. For example, we may disclose information in response to a subpoena
- > To help detect or prevent fraud
- > To law enforcement or governmental agencies
- If you give us written permission first
- > From cookies and other technologies including Google Analytics. The information collected can be combined with other information, allowing third parties to identify users at an individual level, including their behaviors, activities and needs

Under no circumstances do we sell or share your information to or with any party outside of QBENA for purposes of independently selling their products or services to you.

REVIEWING YOUR INFORMATION - DATA SUBJECT ACCESS REQUESTS A

You have the right to review information that QBENA may have collected about you – whether as a policyholder, through your voluntary interaction with this website, or through some other means. In some states, this process is referred to as a Data Subject Access Request or DSAR. In other states, insurance laws allow consumers to request access to recorded personal information held by regulated insurance entities. To learn what personal information QBENA may hold about you, please make such requests using the link below.



We will need your complete name, address, date of birth, and all your policy numbers. Tell us what information you would like to receive or view. We will act on your request in a timely manner, and let you know the nature of the

information and with whom it has been shared. We will also provide names and addresses of any consumer reporting agency that prepared a report about you. You can contact them to get a copy of that report.

If you disagree with our records .

Please let us know if you think any of our information is incorrect. Tell us what is wrong and why. You may ask us to correct, amend or delete it. Within 30 days of receiving your request, we will change your information or inform you of any reasons why we are unable to do so.

If we make any changes to your information, we will notify you of those changes. We will also notify the parties listed below.

- Any party that may have been given such information in the past two years.
- Any insurance-support organization with whom we've shared the data in the past 7 years.
- Any insurance-support organization that gave us the information.
- Consumer Reporting Agencies (CRAs).

If we can't fulfill your request, we will inform you of your right to file a statement. Your statement should tell us what information you think is incorrect and why. If we need to disclose the disputed information, we will mark the matter in dispute and include your statement.

ADDITIONAL STATE/POLICYHOLDER RIGHTS A

QBENA does not share your personal information with third parties for sales and marketing purposes, and only shares your personal information for limited purposes related to administering your policy. For this reason, customers do not have an option to "opt out" of sharing. Policyholders may have additional rights based on the type of policy they hold and their state of residence, as outlined below.

Adverse Underwriting Notice A

MAINE: You have the right to know the reasons for an adverse underwriting decision. Previous adverse underwriting decisions may not be used as the basis for subsequent underwriting decisions unless we make an independent evaluation of the underlying facts. You have the right not to be subjected to pretext interviews (Maine Insurance Bulletin 379, 8/3/2011).

California Privacy Notice A

Privacy rights of California residents and employees are explained in detail at the link below:



Domestic Violence Alternate Contact Notice

ILLINOIS: QBENA will accommodate any reasonable request by a covered person under a policy of accident and health insurance to receive communications of claim-related information by alternative means or at alternative locations, if it is made clear to QBENA that not doing so would endanger the covered person. Alternately, a valid order of protection may be submitted along with an alternative address, telephone number or other contact information. If a child is a covered person, the right established by this section may be asserted by the child's parent or guardian. (Insurance Law 215 ILCS 5/355b).

NEW YORK: When QBENA is provided with a valid Order of Protection against a policyholder or another person covered under a policy, QBENA will not disclose the address and telephone number of the covered individual who is the recipient of the protection order, nor will QBE disclose names of any person or entity providing services to that individual. If a child is the insured, this right may be asserted by the child's parent or legal guardian. The prohibition lasts for the duration of the Order of Protection. (New York State Insurance Law § 2612).

Health Insurance Alternate Contact Notice

WASHINGTON: Any company that issues, delivers, amends, or renews an individual accident and health insurance policy (including a disability insurance policy) must accommodate a reasonable request by a covered person to receive communications that contain protected health information by alternative means (WA ADC 284-04-510).

Health Insurance Portability and Accountability Act (HIPAA) Notices A

Employer Sponsored Group Health Plan Notice

Insurance Support Organizations A

QBE may provide your personal information to insurance support organizations that keep it or provide it to other companies that use the same service. We may share medical information so we can learn if you qualify for coverage, process claims or prevent fraud, or if you say we can. To learn what information we hold about you, you may complete a Data Subject Access Request, or write to us:

QBE North America, Attn: Privacy Official Corporate Legal Department One QBE Way Sun Prairie, WI 53596 Privacy.US-BOX@us.qbe.com

Provide us with your name, address, and policy numbers. Within 30 days of receipt, we will notify you describing the information we have on file.

CHANGES TO ONLINE PRIVACY STATEMENT A

QBENA may make changes to this Online Privacy Statement at any time to reflect changes to our data practices or to comply with applicable laws. Any material changes to our data practices will be reflected in this Online Privacy Statement, along with the date of the most recent revision.

This notice is being provided to you on behalf of QBENA and the following affiliates:				
General Casualty Company of Wisconsin	Praetorian Insurance Company	QBE Specialty Insurance Company		
General Casualty Insurance Company	QBE Insurance Corporation	Regent Insurance Company		
North Pointe Insurance Company	QBE Reinsurance Corporation	Stonington Insurance Company		
		Southern Pilot Insurance Company		

Questions or comments?

QBE North America, Attn: Privacy Official Corporate Legal Department One QBE Way Sun Prairie, WI 53596 800.362.5448 Privacy.US-BOX@us.qbe.com

QBE is a registered service mark of QBE Insurance Group Limited.