

# PRIVACY STATEMENT

Last Revised 1/31/22

AIA Holdings, Inc and BehindThePaper, and its 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.behindthepaper.com](http://www.behindthepaper.com) (the “Site”) 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.

## 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 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 Site, including browser type, IP address, pages visited and other activities on the Site, device type, and time and date of visit, and other information we collect through the use of cookies and similar technology. The Site(s) uses Google Analytics and other third-party services to improve the performance of the Site and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Site, visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners), and to opt out of Google Analytics, visit [tools.google.com/dlpage/gaoptout](http://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.

**California Privacy Rights**

This section contains disclosures required by the California notice at any time to reflect Consumer Privacy Act (“CCPA”) and applies only to “personal information” that is subject to the CCPA.

**Personal Information We Collect.** In the preceding 12 months, we collected the following categories of personal information about California consumers.

What Personal Information do we collect?		Who do we disclose it to?
Categories	Examples	
<b>Identifiers</b>	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.	All categories listed below.
<b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b>	Physical characteristics or description, signature, telephone number, education, employment, employment history, insurance policy number, bank account number, credit card number, debit card number, or any other financial information medical information, or health insurance information.	All categories listed below.
<b>Protected classification characteristics under California or federal law</b>	Age, 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).	All categories listed below.
<b>Commercial information</b>	Records of real or personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	All categories listed below.
<b>Biometric Information</b>	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 scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	All categories listed below.
<b>Internet or other similar network activity</b>	Browsing history, search history, information your interaction with a website, application, or advertisement.	All categories listed below.
<b>Geolocation data</b>	Physical location or movements.	All categories listed below.
<b>Sensory data</b>	Audio recordings, electronic, visual, thermal, olfactory, or similar information.	All categories listed below.
<b>Professional or Employment Information</b>	Employment history, performance reviews.	All categories listed below.
<b>Education Information</b>	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.	All categories listed below.
<b>Inferences from Other Personal Information Collected</b>	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	All categories listed below.

**Categories of Sources.** We collect personal information from the following categories of sources:

- Consumers;
- Service providers;
- Vendors;
- Information brokers;
- Consumers reporting agencies;
- Partners;
- Publicly available sources;
- Insurance agents and brokers;
- Insurance companies;
- Resellers and distributors;
- Social media;
- Government entities; and
- Affiliates.

**Why We Collect, Use, and Share California Information.** We use and disclose the personal information we collect for our commercial and business purposes, as further described in this Privacy Notice. These commercial and business purposes include, without limitation:

- Our commercial purposes, including marketing, advertising, and enabling commercial transactions.
- Our business purposes as identified in the CCPA, which include:
  - Auditing related to our interactions with you;
  - Legal compliance;
  - Detecting and protecting against security incidents, fraud, and illegal activity;
  - Debugging;
  - Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
  - Internal research for technological improvement;
  - Internal operations;
  - Activities to maintain and improve our services; and
  - Other one-time uses.

**Recipients of California Personal Information.**

We disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- Consumers
- Service providers;
- Vendors;
- Credit reporting agencies;
- Distribution partners;
- Insurance companies;
- Insurance claimants;
- Parties to litigation;
- Internet service providers;
- Operating systems and platforms;
- Social networks;
- Government entities; and
- Affiliates.

**Your Rights Regarding Personal Information.** California residents have certain rights with respect to the personal information collected by businesses. If you are a California resident, you may exercise the following rights regarding your personal information, subject to certain exceptions and limitations:

- The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you; the categories of sources from which we collected personal information about you; our purposes for collecting or selling personal information about you; the categories of personal information about you that we have either sold or disclosed for a business purpose; and the categories of third parties with which we have shared personal information.
- The **right to request that we delete** the personal information we have collected from you.
- The **right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information. Please note that, under California law, a business is only required to respond to such a request twice annually. To make such a request, please send an email to the website administrator at [privacy@aiasurety.com](mailto:privacy@aiasurety.com), call (877) 449-2663 or write to:

BehindThePaper  
Attention: Compliance Dept  
PO Box 5600  
Thousand Oaks, CA 91359

**Verification Process and Required Information.** Note that we may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled.

**Authorized Agent.** You may designate an authorized agent to make a CCPA request on your behalf by emailing us at [privacy@aiasurety.com](mailto:privacy@aiasurety.com).

**Minors' Right to Opt In.** We do not knowingly collect personal information from, nor are any of our products or services intended for, or marketed to, children under the age of 13.

**How to Update Your Personal Information**

If you believe that any of the personal information that we have collected about you is incorrect, you may send a written request for review to the address below. We will investigate your report and make any changes that we determine are appropriate and justified.

**Who to Contact About Your Personal Information?**

If you have any questions about this privacy notice or our use of your personal information, you can send an email to the website administrator at [privacy@aiaSurety.com](mailto:privacy@aiaSurety.com) or write to:

BehindThePaper  
Attention: Compliance Dept  
PO Box 5600  
Thousand Oaks, CA 91359