

# U.S. Privacy Policy and Statement



**August 2022**

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## U.S. Privacy Policy and Statement

Your privacy is important to us. At Accredited Surety and Casualty Company Inc. and Accredited Specialty Insurance Company (hereinafter both referred to as “Accredited”), we are committed to protecting your non-public personal information as required by law. This notice is to advise you of how we will handle this information.

Who is Accredited?

Accredited Surety and Casualty Company, Inc. and Accredited Specialty Insurance Company are the strength behind Accredited America, a leader in US Program Management focused on both the admitted and non-admitted markets. Accredited is part of the R&Q Insurance Holdings Ltd, group of companies.

### What is personal data?

In this privacy policy, references to “personal information” or “personal data” are references to information that relates to an identified or identifiable individual. Some examples of personal data are your name, company, e-mail address, address and telephone number but it may also include information such as your IP address and location, in certain jurisdictions.

### Types of Information We Collect on this Website

You can visit the website of Accredited without revealing who you are or providing any personal information about yourself.

There will be times, such as when you request information or a publication, when we will need to obtain personally identifiable information from you or about you. However, this information will not be collected without your knowledge.

The information we receive about you or from you may be used by us to process your inquiry or request; to comply with any law; regulation, or court order; and to help improve our website or the products or services we offer.

When you visit this website, we may collect usage information (including, but not limited to, IP addresses, browser and platform types, domain names, access times, and referral data) to help us understand how our website is navigated and used. This data does not include any personal information about you and is used only to measure and improve the effectiveness of our website.

### How We Use Your Information/Use of Collected Personal Information

Accredited only processes personal information for the purposes described in this Privacy Policy and/or privacy notice for specific services. Such services may include:

- Providing our insurance services to users
- Auditing, research, and analysis in order to maintain, protect, and improve our services
- Ensuring the technical functioning of our network
- Developing new services

**Promotional Messaging or Advertising:**

Any Promotional Messaging or Advertising material is for general informational purposes only and does not constitute an offer to sell or a solicitation of an offer to buy any product or service.

**Ability to Opt-in/Out**

If we propose to use your personal information for any purposes other than those described in this Policy and/or in the specific service notices, you may "opt-out"—or say no to—having your information shared by contacting us through our contact page. We will not collect or use sensitive information for purposes other than those described in this Policy and/or in the specific service notices, unless we have obtained your prior consent.

If you do choose to decline to submit personal information to any of our services, there may be some instances in which we may not be able to provide those services to you.

**Information Provided by You**

When you engage us to provide insurance services, we may ask you for personal information (such as your name, address, social security number, date of birth, phone numbers, credit card information and email address) which we maintain in encrypted form on secure servers. We may combine the information submitted under various forms and services in order to provide customers with a better experience and to improve the quality of our services.

We may need to use your personal data in order to carry out the following activities:

- To set you up as a new client (including carrying out 'know your customer' checks);
- To provide you with an insurance quote;
- To provide our products and services to you;
- To respond to your enquiries;
- To accept payments from you;
- To communicate with you about your policy;
- To renew your policy;
- To obtain reinsurance for your policy;
- To process insurance and reinsurance claims;
- For general insurance administration purposes;
- To comply with our legal and regulatory obligations;
- To model our risks;
- To defend or prosecute legal matters;
- To respond to your enquiries;
- When you sign up for an online account
- To make our products and services better and to develop new products and services; and
- To send you notices and information regarding our products or services, including notifying you about special promotions or offers, where we are legally permitted to do so.

## Information Collected from Other Sources

From time to time, we may receive personal information about you from third party sources but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. This Privacy Policy applies to how we handle your information. We do not exercise control over the websites that are displayed in other browser windows opened by links from within our various services. These other sites may place their own cookies or other files on your computer, collect data, or solicit personal information from you.

## Disclosure of Personal Information to Third Parties, Vendors, Service Providers, or for Company Communications

We may disclose personal information that we collect, or you provide, as described in this privacy policy under the following circumstances:

- To transfer data to our affiliates from time to time for our legitimate business purposes. Affiliates are defined as group companies, subsidiaries, parent companies, joint ventures, and other corporate entities under common Accredited ownership.
- To contractors, service providers, and other third parties we use to support our business that are bound by an obligation to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Website users is among the assets transferred.
- To fulfil the purpose for which you provide it.

A list of our current group companies is available at <https://www.rqih.com/about-us/group-companies/> and a list of our current service providers and partners may be available upon request.

## Choices about the Collection and Use of Your Information

- This website may use "cookies" to enhance your viewing experience. A cookie is a tiny element of data that is sent to your browser to be stored on your hard drive so that we can recognize you when you return. You may set your browser to notify you when you receive a cookie or refuse cookies from all websites. Please note, if you reject cookies, it is possible that some web pages may not load properly, your access to certain information might be denied, or you might be required to enter information more than once.
- Promotional Offers from the Company: If you do not wish to have your e-mail address/contact information used by the Company to promote our own or third parties' products or services, you can opt-out by using one of the methods described above in 'How We Use Your Information'.
- Targeted Advertising: If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by using one of the methods described above in 'How We Use Your Information'.

## **Access to and Correction of Personal Information**

If you believe that any personal information, we have collected about you is inaccurate, you may send a written request via our contact page to correct or delete any personal information that you have provided to us. We will investigate your request and make appropriate changes if warranted.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

## **Collection of Information from Children**

We do not knowingly collect personal information from anyone under the age of 13. If you believe that we are processing personal information pertaining to a child inappropriately, we ask you to contact us at [data.enquiries@rqih.com](mailto:data.enquiries@rqih.com).

For more information about protecting your child's privacy online, visit the Federal Trade Commission website at <https://www.ftc.gov>.

## **Other Considerations**

When you use some Accredited products, services, or applications or post on an Accredited forum, chat room, or social networking service such as Facebook, Twitter, or other such social media sites, the personal information and content you share is visible to other users and can be read, collected, or used by them.

## **The Health Insurance Portability and Accountability Act of 1996 (HIPAA)**

Accredited, as part of the R&Q group of companies, is required by law to take reasonable steps to ensure the privacy of your personally identifiable health information, and to inform you about:

- The Company's uses and disclosures of Protected Health Information ("PHI")
- Your privacy rights with respect to your PHI;
- The Company's duties with respect to your PHI;
- Your right to file a complaint with the Company and to the Secretary of the U.S. Department of Health and Human Services ("HHS"); and
- The person or office to contact for further information regarding the Company's privacy practices.

PHI includes all individually identifiable health information transmitted or maintained by Accredited, regardless of form (e.g., oral, written, electronic). A federal law, the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), regulates PHI use and disclosure by the Accredited. You may find these rules at 45 Code of Federal Regulations Parts 160 and 164. Please review our HIPAA Supplement for the additional rights you have with respect to your Protected Health Information and how to exercise such rights.

## State Specific Privacy Laws

Many states and territories have their own privacy regulations which apply to individuals and corporation that live or do business in, frequent or offer good and services to its residents. The individual laws of these states vary and as such you should familiarize yourself with your individual state laws.

Addendum 1 which can be found at the end of this notice summarizes each current state privacy regulation.

## Confidentiality and Security

We will not add your name to mailing lists unless you specifically request that we do so. We do not share, sell, lease, or rent our mailing or customer lists to third parties. We may, use third parties to help us administer e-mail alerts. If personally identifiable information (i.e., name, address, e-mail address, telephone number) is provided to any of these third parties, we will require that they maintain such information in strictest confidence in compliance with this policy. We also assess new technology for protecting customer information on an ongoing basis.

We take the security of your personal information seriously and make appropriate technical and organizational measures against unauthorized or unlawful processing of personal data, and against accidental loss, destruction of, or damage to, personal data. Please contact us immediately if you believe your Personal Information has been exposed.

Although we take appropriate measures to protect the security of the information communicated through the website, no Internet connected computer system can be made absolutely secure from intrusion. We, therefore, cannot and do not guarantee that information communicated by you to us will be received or that it will not be altered before or after its transmission to us. If you elect to use the website to communicate with us, you do so at your own risk.

## Questions and Concerns

If you have any questions or comments with this privacy statement, or if have any concerns as to the validity of information made available within these pages, we recommend you seek verification by contacting Donald Morgan, Data Protection Officer and Deputy Group Head of Governance, R&Q Insurance Holdings Ltd (47341), 71 Fenchurch Street, London, EC3M 4BS, [Donald.Morgan@rqih.com](mailto:Donald.Morgan@rqih.com).

Please note that we may update and modify this Privacy Statement. It remains your responsibility to access and check these terms and conditions whenever you access the Website as the latest version of these terms and conditions will govern. We do not accept any liability for any errors or omissions.

### Version & Update History

Version Number	Date	Description	By	Approved By
1.0	August 2022	Policy Creation	Dom Serratore Westmont Assoc.	



## **Addendum 1**

### **California Consumer Privacy Act Regulations**

California Civil Code Section §1798.83 and the California Consumer Privacy Act (CCPA) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. The CCPA also provides California residents the right 'To Be Forgotten' by a company.

A California resident has the right to know what Personal Information is collected, used, disclosed, or sold, to delete any Personal Information collected, to opt-out of the sale of Personal Information, and to not be discriminated against for exercising such rights.

#### **Right to Know**

A California resident has the right to request that we disclose what Personal Information we collect, use, disclose or sell. You may request that we disclose the following information upon receipt of a verifiable consumer request:

- (1) The categories of Personal Information collected and categories of sources from which the Personal Information is collected.
- (2) The business or commercial purpose for collecting or selling Personal Information.
- (3) The categories of third parties with whom we share Personal Information.
- (4) The specific pieces of Personal Information we have collected about you.

#### **Right to Delete**

As a California resident, you have the right to request that we delete any Personal Information about you which we have previously collected. If it is necessary for us to maintain the Personal Information for certain purposes, we are not required to comply with your deletion request. If we determine that we will not delete your Personal Information when you request us to do so, we will inform you and tell you why we are not deleting it.

#### **Notice of Right to Opt-Out of Sale/Sharing of Personal Information**

We do not sell Personal Information, including the Personal Information of minors under the age of 16. However, pursuant to applicable law, a California resident, may request that their information not be sold in the future. To do so please send a request via our 'Contact Us' page.

#### **No Discrimination**

You have the right not to be discriminated against because you exercised any of your rights under the CCPA.

If you would like to exercise any such rights, please send a request to [data.enquiries@rqih.com](mailto:data.enquiries@rqih.com).

### **Virginia Consumer Data Protection Act**

The Virginia Consumer Data Protection Act (VCDPA) provides consumers with certain rights related to their personal data. Under the Act, these rights include:

1. The right to know, access and confirm personal data.
2. The right to delete personal data.
3. The right to correct inaccuracies in personal data.
4. The right to data portability (i.e., easy, portable access to all pieces of personal data held by a company).
5. The right to opt out of the processing of personal data for targeted advertising purposes.
6. The right to opt out of the sale of personal data.
7. The right to opt out of profiling based upon personal data.
8. The right to not be discriminated against for exercising any of the foregoing rights.

If you are a Virginia resident and would like to exercise any such rights, please send a request to [data.enquiries@rqih.com](mailto:data.enquiries@rqih.com).

### **Colorado Privacy Act**

The Colorado Privacy Act (CPA) provides consumers with certain rights related to their personal data. Under the Act, these rights include

The CPA provides five main rights for the consumer.

**Right of access.** You have the right to confirm whether a controller is processing your personal data and to have the sole right to access your personal data.

**Right to correction.** You have the right to correct inaccuracies in any personal data, taking into account the nature of the personal data and the purposes of the processing of your personal data.

**Right to delete.** You have the right to delete personal data concerning the consumer.

**Right to data portability.** You have the right to obtain your personal data in a portable and, to the extent technically feasible, readily usable format that allows you the consumer to transmit the data to another entity without hindrance.

**Right to opt out.** You have the right to opt out of the processing of your personal data purposes of:

- targeted advertising;
- the sale of personal data, or
- profiling in furtherance of decisions that produce legal or similarly significant effects you as the consumer.”

**Right to appeal.** The CPA also provides you the right to appeal a business’ denial to take action within a reasonable time period. A business must respond to a request within 45 days of receipt and may subsequently extend that deadline by an additional 45 days when reasonably necessary. When a business elects to extend that deadline, it must notify you within the initial 45-day response period.

If you are a Colorado resident and would like to exercise any such rights, please send a request to [data.enquiries@rqih.com](mailto:data.enquiries@rqih.com).

### **Massachusetts Information Privacy Act**

MGL c.214, § 1B Right of **Privacy** of the Massachusetts Information Privacy Act (MIPA) provides that any Massachusetts resident (resident) shall have a right against unreasonable, substantial, or serious interference with his privacy. Information may only be collected with the resident’s express permission and any company that holds such information must immediately delete upon a request to do so from the impacted resident.

To make such any such request as a resident of the Commonwealth of Massachusetts, please send a request to [data.enquiries@rqih.com](mailto:data.enquiries@rqih.com).