

# California Consumer Privacy Act Supplement

*This Supplement applies to Randall & Quilter Investment Holdings Ltd. and its affiliate companies ("R&Q," "we," "us," or "our") listed at the bottom of this California Consumer Privacy Act Supplement.*

Last updated: May 16, 2022

This Supplement applies only to California residents. It describes our collection, disclosure, and use of Personal Information that is subject to the California Consumer Privacy Act of 2018, as amended from time to time ("CCPA") and your rights under that law. This Supplement does not apply to information that is exempt from or otherwise unregulated by the CCPA.

## What is Personal Information

The CCPA lists eleven (11) general categories of information that are subject to its scope and defines Personal Information as information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly with a particular consumer (a natural person who resides in California) or household in California. The eleven (11) categories of information subject to the CCPA are:

- (1) **"Identifiers"** such as real name, alias, postal address, unique personal identifier, or online identifier, internet protocol (IP) address, email address, account name, Social Security Number (SSN), driver's license number, or passport number, or other identifiers, which may be used to identify you, your family or devices used.
- (2) **"California Customer Records"** may include, in addition to **Identifiers**, the following: signature, physical characteristics or description, telephone number, state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any financial information, medical information or health insurance information.
- (3) **"Protected Classification Characteristics"** under California or federal law such as race, national origin, religion, gender, sexual orientation, or medical information or health insurance information.
- (4) **"Commercial Information"** including records of personal property and purchasing habits.
- (5) **"Biometric Information"** means an individual's physiological, biological, or behavioral characteristics that can be used to establish an individual's identity. For example: fingerprints, face prints, and voiceprints; iris or retina scans; keystrokes, gait, or other physical patterns, and sleep, health, or exercise data.
- (6) **"Internet or Other Electronic Network Activity Information"** may include, for example, website information, browsing history, search history, information regarding a consumer's interaction with an internet website, application, or advertisement.
- (7) **"Geolocation data"** Identifiers where a consumer is physically located or their movements.
- (8) **"Sensory"** Audio, electric, visual, thermal, olfactory, or similar information, for example, telephone / audio recordings.

- (9) **“Professional or employment-related information”** may relate to information about current or past employment.
- (10) **“Education”** Non-publicly available educational information as defined under the Family Educational Rights and Privacy Act (FERPA) and related regulations (20 U.S.C. § 1232g; 34 C.F.R. §§ 99.1 to 99.67).
- (11) **“Inferences”** drawn from other personal information to create consumer profiles reflecting a consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

The purposes for which we use the Personal Information that we collect depends on our relationship or interaction with a specific California consumer.

## Your Personal Information

### Personal Information Collected

In the past twelve (12) months, we may have collected the following types of Personal Information relating to California residents for a business purpose;

- Identifiers, such as name and government-issued identifier (e.g., Social Security number);
- California Customer Records, such as contact information and financial information;
- Protected Classifications Characteristics under California or federal law, such as gender and marital status;
- Commercial information, such as internet transaction information and purchase history;
- Geographical data;
- Audio, electronic, visual, and similar information, such as call recordings;
- Professional or employment-related information, such as verification of employment;
- Education information; and
- Inference drawn from any of the Personal Information listed above to create a profile about, for example, an individual’s preferences and characteristics.

### Sources of the Personal Information Collected

We collect the information listed in the “Personal Information Collected” section above from you directly when you complete and submit applications or other forms in connection with our insurance products or services, visit our website, transact with us, or otherwise communicate with us.

We may also collect the information listed in the “Personal Information Collected” section above from other sources, such as:

- Consumer reporting agencies or insurance support organizations to receive information like motor vehicles records, credit report information, and insurance claims history;
- Your employer and/or association for our products and services, to receive information regarding your employment; and
- Organizations who may have provided you with life, long-term care, or disability products, medical professionals who have provided care to you, and insurance support organizations.

We do not automatically log Personal Information, nor do we link information automatically logged by other means with Personal Information about specific individuals.

### **Business Purposes for Collection**

We believe strongly in the protection of personal privacy and are committed to complying with the state and federal regulations that govern the collection and use of Personal Information. The information listed in the “Personal Information Collected” section above will only be used to:

- Service or process an insurance product or service we offer
- Maintain or service a customer account
- Verify customer information
- Provide reinsurance
- Detect security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity
- Understand the activity on our website
- Perform audits related to a current interaction with a customer and concurrent transactions
- Provide customer service
- Respond to inquiries.

### **Sharing of Personal Information**

We may share the information listed in the “Personal Information Collected” section above for the business purposes listed in the “Business Purposes for Collection” listed above with the following third parties:

- Our affiliates
- Our service providers, including but not limited to those who:
  - host our databases, infrastructure, and website;
  - assist us with the financial, regulatory, and legal aspects of our business; and
  - provide analytics services
- Courts or governmental entities as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request, or other legal or regulatory processes
- Our assignees or successors in connection with a merger, acquisition, reorganization, liquidation, change in control, or other sales by or of us or any affiliated entity (in each case, whether in whole or in part).

### **Rights Under the CCPA**

Under California Consumer Privacy Act (CCPA), 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. If you are a California resident, 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**

If you are a California resident, you have the right to request that we delete any Personal Information about the resident which we collected from the resident. 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.

### **Right to Opt-Out of Sale 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, if you are a California resident, you may request that your information not be sold in the future by going to our “Do Not Sell My Personal Information” web page.

### **No Discrimination**

If you are a California resident, you have the right not to be discriminated against because you exercised any of your rights under the CCPA.

### [How to Make a Request](#)

You may make a verifiable consumer request for the disclosure described above for yourself or on behalf of your minor child. To exercise this right, you or your authorized agent may submit a request using the following methods:

Customer Service Email: [privacy.info@accredited-inc.com](mailto:privacy.info@accredited-inc.com)

Phone: 888-668-2791

Randall & Quilter Investment Holdings Ltd.

c/o Accredited Surety and Casualty Company, Inc. *or* Accredited Specialty Insurance Company

Attn: General Counsel

P.O. Box 140854

Orlando, FL 32814-0854

We will then verify the request by contacting you directly and process the request accordingly. If we cannot verify your identity to make the request, we will not be able to comply with your request. We will inform you if we cannot verify your identity.

### [Response Time](#)

Once we are in receipt of a request to know or a request to delete, we will contact you directly within ten (10) business days to verify the request. Once verification is complete, we will process the request accordingly and provide a final response within forty-five (45) days of receipt of your request. Should more time be needed, we will inform you of the reason and extension period in writing. It is important to note that you may submit a verifiable consumer request as frequently as you would like, but we are not required to respond to requests to provide Personal Information to you more than twice within a twelve (12) month period.

We will not charge a fee to process or respond to your verifiable consumer request.

In some instances, we may decline to honor your request. For example, if we cannot verify your identity or confirm that the Personal Information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. We may also

decline to honor a request where the Personal Information about you is not subject to the CCPA's access and/or deletion right, such as compliance with legal obligations.

### Authorized Agent

A California consumer may use an authorized agent to assist in their request to know and request to delete. An "Authorized Agent" means a natural person, or a business entity registered with the Secretary of State that a consumer has authorized to act on their behalf subject to the following requirements:

1. Provide the authorized agent written permission to do so; and
2. Verify their own identity directly with the business.

This does not include an authorized agent with a power of attorney. We may deny a request from an agent that does not submit proof that they have been authorized by a California resident to act on their behalf.

### General Privacy Contact Details

If you have any questions or comments about this Supplement CCPA Notice, the general Privacy Notice, or your rights, please do not hesitate to contact R&Q at:

Customer Service Email: [privacy.info@accredited-inc.com](mailto:privacy.info@accredited-inc.com)

Phone: 888-668-2791

Randall & Quilter Investment Holdings Ltd.

c/o Accredited Surety and Casualty Company, Inc. *or* Accredited Specialty Insurance Company

Attn: General Counsel

P.O. Box 140854

Orlando, FL 32814-0854

### Changes to Our CCPA Supplemental Notice

We reserve the right to amend this Supplement at our discretion and at any time. When we make changes to the Supplement, we will post the updated Supplement on our websites and update the effective date. **Your continued use of our website(s) following the posting of changes constitutes your acceptance of such changes.**

### Applicability

This Supplement is applicable to the following State: **California**

This Supplement applies to the following R&Q Companies:

1. Accredited Surety and Casualty Company, Inc.
2. Accredited Specialty Insurance Company