



Effective Date

This Privacy Policy is effective as of February 1, 2024, and it was last updated on January 25, 2024.

Scope

Conner Strong & Buckelew Companies, LLC and its affiliates (collectively, "Conner Strong & Buckelew," "we," "our," or "us") are committed to respecting your privacy. This Privacy Policy describes how we collect, use, and disclose your personal information, including via our websites (e.g., www.connerstrong.com, www.permafair.com, www.permainc.com, www.jamontgomery.com, mobile applications, and the services we provide ("Services"), including after we no longer provide those Services to you. Our websites and mobile applications are referred to as the "Sites." "Personal information" is non-public information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to an individual.

When you use our Services, you agree to our collection, use, and disclosure of personal information about you as described in this Privacy Policy. If you do not provide us with personal information we request, we may not be able to provide you with our Services or your experience when using those Services may be impaired.

Personal Information We Collect

Below you will find a chart that describes the categories of personal information we, or service providers or contractors on our behalf, have collected or may collect, where that personal information came from or could come from, and the purpose for the collection of that personal information, all within the past 12 months from the effective date of this notice. Please note that these are categories of personal information as they are set forth under applicable state law and across our various product lines. We did not necessarily collect all of the specific pieces of personal information listed for any given person or product. In addition to personal information, we may also collect, use, and/or disclose anonymous, de-identified, and/or aggregate data that is not linked to a particular individual. Our use or disclosure of such information is outside the scope of this Privacy Policy. We only maintain and use such data in a way that does not reasonably identify a particular individual, and we will not attempt to re-identify it, except to test our de-identification process.

For purposes of this Privacy Policy:

- Personal information collected from you or from others on your behalf means that we receive that information from you, your employer or union (e.g., if we administer your employer's or union's employee benefits plan), or from entities you refer us to (e.g., your medical provider)
Operational functions include things like rating, underwriting, and issuing insurance policies, administering benefits, providing brokerage or consulting services under your or your employer's insurance contract, auditing our products or services, understanding how our Sites are used, improving our services, security, preventing fraud, and for legal compliance purposes

Table with 3 columns: What Personal Information Do We Collect?, Where Do We Get It?, Why Do We Collect It?
Row 1: Identifiers and contact information (e.g., you and your beneficiaries' names, alias, postal address, unique personal identifier, IP address, email) | Directly from you or from others on your behalf | Operational functions, Marketing

address, account name, Social Security Number, driver's license number)	<ul style="list-style-type: none"> <li>• Data sellers</li> <li>• Marketing partners</li> <li>• Department of Motor Vehicles</li> <li>• Consumer reporting agencies</li> </ul>	
Categories of personal information described in <a href="#">Section 1798.80(e)</a> (e.g., name, signature, Social Security number, physical characteristics or description, mailing address, telephone number, driver's license, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, any other financial information, medical information, health insurance information)	Same as above	Same as above
Characteristics of protected classifications under applicable state or federal law (e.g., sexual orientation, gender identity and gender expression, sex, medical conditions, disability, age, genetic information, marital status, military or veteran status, union membership)	Directly from you or from others on your behalf	<ul style="list-style-type: none"> <li>• Operational functions</li> </ul>
Commercial information (e.g., records of personal property, products or service purchased, obtained, or considered)	Directly from you or from others on your behalf	<ul style="list-style-type: none"> <li>• Operational functions</li> <li>• Marketing</li> </ul>
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	From your interaction with our website (additional information in the Digital Technologies section below)	<ul style="list-style-type: none"> <li>• Operational functions</li> <li>• Marketing</li> </ul>
Audio, electronic, visual, thermal, olfactory, or similar information	Recorded Customer Service phone calls	<ul style="list-style-type: none"> <li>• Operational functions</li> </ul>
Professional or employment-related information	<ul style="list-style-type: none"> <li>• Directly from you or from others on your behalf</li> <li>• Data sellers</li> </ul>	<ul style="list-style-type: none"> <li>• Operational functions</li> <li>• Marketing</li> </ul>
Personal information that reveals a consumer's precise geolocation	Directly from you or from others on your behalf	<ul style="list-style-type: none"> <li>• Operational functions</li> </ul>



Personal information collected and analyzed concerning a consumer’s health	Directly from you or from others on your behalf	<ul style="list-style-type: none"> <li>Operational functions</li> </ul>
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As reflected above, we process your personal information as necessary for performing our contract or our legitimate interests in informing you about our products and services and providing you with those products and services pursuant to our contract.

*Digital Technologies*

When you interact with our Sites and Services, certain information about your use may be collected automatically. This includes:

- Details of your visits to and information generated in the course of your use of the Sites (including the timing, frequency, and pattern of service use) including, but not limited to, traffic data, location data, weblogs and other communication data, the resources that you access, and how you reached our Sites;
- Details regarding the device you use to access our Services, including but not limited to your IP address, operating system, and browser type;
- Information about how you interact with our ads and newsletters, including whether you open or click links in any correspondence; and
- Information that you make available to us on social media platforms, such as by clicking on a social media icon linked from our Sites or Services, including your account ID or username and other information included in your posts.

We rely on partners, such as Google Analytics, to provide many features of our Sites and Services and provide us data about your use. This information may be collected through cookies, web beacons, and other tracking technologies, as well as through your web browser or device. These tracking technologies may be used for the following purposes:

- Advertising: Allowing us to provide targeted advertisements or marketing communications that we believe may be of interest to you.
- Analytics: Allowing us to understand how our services are being used, track site performance, and make improvements.
- Site Operations: Enabling features that are necessary for providing you the services on our Sites, such as identifying you as being signed in, tracking content views, and remembering your preferences.
- Social Media: Enabling content-sharing on social networking sites (e.g., LinkedIn, Facebook).

You can learn more about Google’s cookies by visiting “How Google Uses Data When You Use Our Partners’ Sites or Apps,” located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

If you interact with us through social media, your interaction may allow that social media company to collect digital tracking information about you or your device, including through the use of tracking technologies. Please visit the social media company’s respective privacy policy to better understand its data collection practices and the controls it makes available to you.

If you prefer not to have the benefits of cookies, your internet browser or other third party software on your workstation can be adjusted to treat cookies in different ways. Depending upon the type of browser you are using, you might be able to configure your browser: (i) to prompt you to accept or reject cookies on an individual basis; or (ii) to prevent your browser from accepting any cookies at all. You should refer to the supplier or manufacturer of your web browser for specific details about cookie security. For general information about how to manage cookies, visit [www.allaboutcookies.org/manage-cookies/](http://www.allaboutcookies.org/manage-cookies/) (please note that this website is not connected to us and we are not responsible for its content). Rejecting cookies might affect your ability to perform certain transactions on our Website and our ability to recognize your browser from one visit to the next.

For more information about your choices with regard to interest based advertising, you may wish to visit the Digital Advertising Alliance’s Consumer information page: <http://www.aboutads.info/consumers/>.

Your browser or device may include “Do Not Track” functionality. At this time, we do not alter our Sites’ data collection and use practices in response to Do Not Track signals.

If you engage with our Site’s chat feature, please know that we sometimes use chatbots or other service provider or contractor services to provide such features. Your conversations with these chatbots provide such service providers and contractors access to the information you enter into the chat, but we contractually require them to only use that information to provide us with their services.

**Personal Information Disclosed Within the Past 12 Months**

Below you will find a chart that generally describes the categories of personal information we have disclosed and the purpose for the disclosure of that information, all within the past 12 months from the effective date of this notice.

What Personal Information Do We Disclose?	To Whom Do We Disclose It?	Why Do We Disclose It?
Identifiers and contact information (e.g., you and your beneficiaries’ names, alias, postal address, unique personal identifier, IP address, email address, account name, Social Security Number, driver’s license number)	<ul style="list-style-type: none"> <li>• Insurers and insurance agents</li> <li>• Benefit administration companies</li> <li>• Government agencies</li> <li>• Group policy sponsors (e.g., your employer)</li> <li>• Service providers and contractors (e.g., IT)</li> <li>• Credit bureaus</li> </ul>	To provide you or your employer with insurance or consulting services (e.g., underwriting, rating, or quoting an insurance policy or benefits offering, processing enrollment in the same, processing claims, auditing our services), in

	<ul style="list-style-type: none"> <li>• Medical care institutions and professionals</li> </ul>	order to verify insurance coverage or benefits, advocate for coverage and market our services
Categories of personal information described in <a href="#">Section 1798.80(e)</a> (e.g., name, signature, Social Security number, physical characteristics or description, mailing address, telephone number, driver's license, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, any other financial information, medical information, health insurance information)	Same as above	Same as above
Characteristics of protected classifications under applicable state or federal law (e.g., sexual orientation, gender identity and gender expression, sex, medical conditions, disability, age, genetic information, marital status, military or veteran status, union membership)	<ul style="list-style-type: none"> <li>• Insurers and insurance agents</li> <li>• Benefit administration companies</li> <li>• Group policy sponsors (e.g., your employer)</li> <li>• Service providers and contractors (e.g., IT)</li> </ul>	To provide you or your employer with insurance or consulting services
Commercial information (e.g., records of personal property, products or service purchased, obtained, or considered)	<ul style="list-style-type: none"> <li>• Insurers and insurance agents</li> <li>• Benefit administration companies</li> <li>• Group policy sponsors (e.g., your employer)</li> <li>• Service providers and contractors (e.g., IT)</li> </ul>	To provide you or your employer with insurance or consulting services and market our services
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement	Service providers and contractors	To provide and market our services

Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none"> <li>• Insurers and insurance agents</li> <li>• Service providers and contractors (e.g., IT)</li> </ul>	To provide you or your employer with insurance or consulting services
Professional or employment-related information	<ul style="list-style-type: none"> <li>• Insurers and insurance agents</li> <li>• Government agencies</li> <li>• Group policy sponsors (e.g., your employer)</li> <li>• Service providers and contractors (e.g., IT)</li> </ul>	To provide you or your employer with insurance or consulting services and market our services
Personal information collected and analyzed concerning a consumer's health	<ul style="list-style-type: none"> <li>• Insurers and insurance agents</li> <li>• Group policy sponsors (e.g., your employer)</li> <li>• Service providers and contractors (e.g., IT)</li> <li>• Medical care institutions or providers</li> </ul>	To provide you or your employer with insurance and address gaps in care

In addition to the above, in certain circumstances, as permitted by law, we might disclose some information without an explicit authorization from you. For example, we may disclose your personal information to insurance regulatory authorities, law enforcement, and similar authorities to comply with applicable law or legal process, protect our interests, or prevent or prosecute fraud. Your personal information may also be transferred in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. Among our affiliates, we only share your information as permitted by law.

We have not, and do not, sell or share your personal information, as those terms are defined by applicable state law, including for targeted advertising purposes, and we do not use or disclose your sensitive personal information for any purposes other than those permitted by law (e.g., as necessary to provide goods or services you have requested, legal compliance, etc.).



### **Children's Information**

Our Sites and Services are intended for users age sixteen and over. No one under the age of 16 may provide any personal information on the Sites. We do not knowingly collect personal information from children under 16 and therefore, we do not sell or share such personal information. If you are under 16, do not use or provide any information on the Sites. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the email address below.

### **How We Secure Your Information**

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through our Sites and Services. While we use precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

### **Your Privacy Rights**

You can limit our sharing with our affiliates for their business purposes or our sharing your information with anyone (affiliates and non-affiliates) for marketing purposes by contacting us using the information in the "Contact Us" section below.

Residents of California, including via an authorized agent, have the following rights:

- The right to know what personal information we have collected about you, including the categories of personal information, categories of sources from which we collected the personal information, the purpose for our collection of your personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you, and receive a copy of the same;
- The right to delete personal information we have collected from you, subject to certain exceptions;
- The right to correct inaccurate personal information that we maintain about you;
- The right to opt-out of the sale or sharing (sometimes called "targeted advertising") of your personal information; and
- The right to not receive discriminatory treatment for exercising your privacy rights.

Certain information we collect may be exempt from these rights, for example, because it is public information (i.e., it is made available by a government entity) or covered by a specific federal privacy law, such as the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act.

Certain states (e.g., Arizona, California, Connecticut, Georgia, Illinois, Kansas, Maine, Massachusetts, Minnesota, Montana, Nevada, New Jersey, North Carolina, Ohio, Oregon, Virginia, and Wisconsin) provide consumers with a right to access or correct personal information collected about them. For additional information regarding our privacy practices or your rights, you may contact us using the information in the "Contact Us" section below.



*How to Submit a Request to Know, Access, Correct, or Delete*

If you have the right to submit a request to know, access, correct, or delete personal information, you or your authorized agent can email your request to [compliance@connerstrong.com](mailto:compliance@connerstrong.com) call us toll-free at 1-877-861-3220, or download and submit the [Privacy Request Form](#).

*What Happens After You Submit a Request to Know, Access, Correct, or Delete*

Following a request to know, access, correct, or delete your personal information, we will take commercially reasonable steps to verify your identity, such as asking you to provide information matching what we have in our files (e.g., contact information). If you are an agent authorized to make a request on another individual's behalf, please indicate that when submitting your request. Agents must generally provide a signed authorization evidencing their authority to act on behalf of another individual. We will process your request in accordance with applicable law.

**Document Retention**

We will not retain your personal information for longer than reasonably necessary for the purpose(s) we collected it. How long we retain your personal information depends on a number of criteria, including the nature of our relationship with you, whether you or your employer purchases one of our products, which product, when you last interacted or were insured with us, the type of personal information at issue, and legal considerations.

**Users Outside the United States**

If you use our Sites and Services outside the United States, you understand that we collect, process, and store your information in the United States. The laws in the United States regarding personal information may be different from the laws of your jurisdiction. When we transfer personal information to the United States, we do so in accordance with applicable law and subject to appropriate safeguards, including, for example, standard data protection clauses. If you would like more information about our international transfers of personal information, please contact us via the contact information provided in the "Contact Us" section below.

**Changes to this Privacy Policy**

We may update this Privacy Policy at any time. The "Effective Date" at the top of this page indicates when this Privacy Policy was last revised.

**Contact Us**

If you have any questions we can be reached either by email at [compliance@connerstrong.com](mailto:compliance@connerstrong.com), by toll-free telephone number at 1-877-861-3220, or via mail at:

Conner Strong & Buckelew Companies, LLC  
PO BOX 99106  
Camden, NJ 08101  
Attn: General Counsel