

**Liberty Mutual Group California Privacy Policy (Consumers)**  
**Effective September 2024**

This California Privacy Policy supplements the general Liberty Mutual Privacy Notice information that we provide at or before the point of information collection, at [Lmi.co/caprivacynotices](https://lmi.co/caprivacynotices) for California consumers, as this term is defined in the California Consumer Privacy Act of 2018 (“CCPA”) as amended. This Policy is provided on behalf of the Liberty Mutual Group, its affiliates, and subsidiaries (collectively “Liberty Mutual” or “we”, “us” and “our”). It describes the personal information we collect and how we use it. It also describes additional rights you may have under the CCPA. This Policy does not apply to employees or job applicants.

**I. What Information Did Liberty Mutual Collect?**

In the preceding twelve (12) months, Liberty Mutual collected the following categories of personal information listed below. The data Liberty Mutual collects varies based on your relationship to us.

<b>Category</b>	<b>Examples</b>
Identifiers	Real name, alias, postal address, online identifier, Internet Protocol address, email address, account name, Social Security Number, driver’s license number, or other similar identifiers.
Personal Information described in California Civil Code § 1798.80(e)	Name(s), signature, physical characteristics or description, telephone number, state identification card number, insurance policy number, education, bank account number, financial information, medical information, or health insurance information.
Protected Classification Characteristics	Age (40 years or older), race, color, 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, or veteran or military status.
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories and tendencies.
Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
Professional or employment related information	Current or past job history or performance evaluations.
Inferences drawn from other personal information	Profiles reflecting a person’s preferences, characteristics, psychological, trends, predispositions, behavior, and attitudes.
Risk Data	Accident, injury, and/or driving history; this may include data from consumer reporting agencies, such as motor vehicle records and loss history information, health data, or criminal convictions.
Claims Data	Information about previous and current claims, which may include information regarding health, criminal convictions, third party reports, or other personal information.
Transaction Data	Balances, payment histories, parties to transactions, information from consumer reports, and other data collected in relation to our provision of insurance services.
Sensitive Data	As defined under the California Privacy Rights Act

## II. How Did Liberty Mutual Collect This Information?

In the preceding twelve (12) months, Liberty Mutual obtained personal information about California consumers from the following categories of sources:

- **Information you provide to us directly**, including for example, information provided in your insurance application or other forms and online via event registration forms, newsletter subscriptions, the auto quoting application, home quoting application, life quoting tools, claims service online reporting, disability claim or leave of absence online reporting, safety and health online catalog order form, risk strategies library registration, online customer service, tuition insurance quoting application, and through Liberty Mutual Rewards;
- **Information we collect or receive from third parties**, including brokers you have communicated with in relation to your policy, insurance applications you have completed or that brokers have completed on your behalf, your business dealings with us and other companies including, but not limited to, your claims and payment history, transactions, limits and rates, information required for billing and payments to/from motor vehicle departments, inspection services, medical providers, anti-fraud databases, court judgments and other databases, government entities, advertising networks, data analytics providers, data brokers, witnesses, experts, loss adjusters, and claim handlers;
- **Social Networks**: You may choose to utilize your social media profile from social networking sites, such as Facebook or Twitter, to access content on our website. By doing so, you specifically grant permission and authorize us to collect, store, and use authorized personal information from these sites as indicated during the authorization process;
- **Publicly available sources**; and/or
- **Our subsidiaries and affiliates.**

## III. How Did Liberty Mutual Use This Information?

In the preceding twelve (12) months, Liberty Mutual used the following categories of data for the purposes listed below and may have disclosed this information to certain categories of third parties.

Business Purpose	Categories of Data	Disclosed to these Categories of Third Parties
<b>Market, sell and provide insurance to California consumers</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service Providers;</li> <li>▪ Liberty Mutual affiliates;</li> <li>▪ Insurance support organizations;</li> <li>▪ Brokers and agents;</li> <li>▪ Government entities;</li> <li>▪ Consumer reporting agencies;</li> <li>▪ Advisors including law firms, accountants, auditors, and tax advisors;</li> <li>▪ Insurers, re-insurers, policy holders, and claimants;</li> <li>▪ Group policyholders (for reporting claims data or an audit);</li> <li>▪ Advertising networks, data analytics providers, and social networks;</li> </ul>

		<ul style="list-style-type: none"> <li>▪ Service providers, person, organizations and affiliates for actuarial or research studies; and/or</li> <li>▪ As permitted by law.</li> </ul>
<b>Manage your claim</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service Providers;</li> <li>▪ Liberty Mutual affiliates;</li> <li>▪ Insurance support organizations;</li> <li>▪ Brokers and agents;</li> <li>▪ Government entities;</li> <li>▪ Consumer reporting agencies;</li> <li>▪ Advisors including law firms, accountants, auditors, and tax advisors;</li> <li>▪ Insurers, re-insurers, policy holders, and claimants;</li> <li>▪ Group policyholders (for reporting claims data or an audit);</li> <li>▪ Service providers, person, organizations and affiliates for actuarial or research studies; and/or</li> <li>▪ As permitted by law.</li> </ul>
<b>Day to Day Business and Insurance Operations</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service Providers;</li> <li>▪ Liberty Mutual affiliates;</li> <li>▪ Insurance support organizations;</li> <li>▪ Brokers and agents;</li> <li>▪ Government entities;</li> <li>▪ Consumer reporting agencies;</li> <li>▪ Advisors including law firms, accountants, auditors, and tax advisors;</li> <li>▪ Insurers, re-insurers, policy holders, and claimants;</li> <li>▪ Group policyholders (for reporting claims data or an audit);</li> <li>▪ Advertising networks, data analytics providers, and social networks;</li> <li>▪ Service providers, person, organizations and affiliates for actuarial or research studies; and/or</li> <li>▪ As permitted by law.</li> </ul>
<b>Security and Fraud Detection</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service Providers;</li> <li>▪ Liberty Mutual affiliates;</li> <li>▪ Insurance support organizations;</li> <li>▪ Brokers and agents;</li> <li>▪ Government entities;</li> <li>▪ Consumer reporting agencies;</li> <li>▪ Advisors including law firms, accountants, auditors, and tax advisors;</li> <li>▪ Insurers, re-insurers, policy holders, and claimants;</li> <li>▪ Group policyholders (for reporting claims data or an audit);</li> <li>▪ Service providers, person, organizations and affiliates for actuarial or research studies; and/or</li> </ul>

		<ul style="list-style-type: none"> <li>▪ As permitted by law.</li> </ul>
<b>Regulatory and Legal Requirements</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service Providers;</li> <li>▪ Liberty Mutual affiliates;</li> <li>▪ Insurance support organizations;</li> <li>▪ Brokers and agents;</li> <li>▪ Government entities;</li> <li>▪ Consumer reporting agencies;</li> <li>▪ Advisors including law firms, accountants, auditors, and tax advisors;</li> <li>▪ Insurers, re-insurers, policy holders, and claimants;</li> <li>▪ Group policyholders (for reporting claims data or an audit);</li> <li>▪ Advertising networks, data analytics providers, and social networks;</li> <li>▪ Service providers, person, organizations and affiliates for actuarial or research studies; and/or</li> <li>▪ As permitted by law.</li> </ul>
<b>Improve Your Customer Experience and Our Products</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service Providers;</li> <li>▪ Liberty Mutual affiliates;</li> <li>▪ Insurance support organizations;</li> <li>▪ Brokers and agents;</li> <li>▪ Advisors including law firms, accountants, auditors, and tax advisors;</li> <li>▪ Insurers, re-insurers, policy holders, and claimants;</li> <li>▪ Group policyholders (for reporting claims data or an audit);</li> <li>▪ Advertising networks, data analytics providers, and social networks;</li> <li>▪ Service providers, person, organizations and affiliates for actuarial or research studies; and/or</li> <li>▪ As permitted by law.</li> </ul>
<b>Analytics to identify, understand, and manage our risks and products</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Protected Classification Characteristics</li> <li>▪ Commercial Information</li> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service Providers;</li> <li>▪ Liberty Mutual affiliates;</li> <li>▪ Insurance support organizations;</li> <li>▪ Brokers and agents;</li> <li>▪ Advisors including law firms, accountants, auditors, and tax advisors;</li> <li>▪ Insurers, re-insurers, policy holders, and claimants;</li> <li>▪ Group policyholders (for reporting claims data or an audit);</li> <li>▪ Service providers, person, organizations and affiliates for actuarial or research studies; and/or</li> <li>▪ As permitted by law.</li> </ul>
<b>Customer service and technical support</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ Personal Information</li> <li>▪ Commercial Information</li> </ul>	<ul style="list-style-type: none"> <li>▪ Service Providers;</li> <li>▪ Liberty Mutual affiliates;</li> <li>▪ Insurance support organizations;</li> <li>▪ Brokers and agents;</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Internet or other similar network activity</li> <li>▪ Professional or employment related information</li> <li>▪ Inferences drawn from other personal information</li> <li>▪ Risk data</li> <li>▪ Claims data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Advisors including law firms, accountants, auditors, and tax advisors;</li> <li>▪ Insurers, re-insurers, policy holders, and claimants;</li> <li>▪ Group policyholders (for reporting claims data or an audit);</li> <li>▪ Service providers, person, organizations and affiliates for actuarial or research studies; and/or</li> <li>▪ As permitted by law.</li> </ul>
<b>Cross-Context Behavioral Advertising</b>	<ul style="list-style-type: none"> <li>▪ Identifiers</li> <li>▪ IP address</li> <li>▪ Internet or other similar network activity</li> </ul>	<ul style="list-style-type: none"> <li>▪ We share this information with service providers such as search engines and social media platforms</li> </ul>

#### **IV. Categories of Information Sold or Shared**

In the last 12 months, Liberty Mutual did not sell your data as defined by the California Consumer Privacy Act (CCPA), as amended. If you visit libertymutual.com or other Liberty Mutual websites, we may share (as defined under CCPA) some personal information (e.g. IP address, device ID) for cross-context behavioral advertising. This data is shared with other websites and social media platforms to display targeted advertisements to you.

#### **V. Your Right To Access, Delete and Correct Your Information**

The California Consumer Privacy Act of 2018, as amended, provides California consumers with specific rights to access, delete or correct personal information. These rights are subject to certain exceptions, including for example, if the personal information was collected pursuant to Gramm-Leach-Bliley, the privacy law regulating insurance companies. Our response to your exercise of rights may be limited as permitted under law.

##### **A. Access or Deletion**

You may have the right to request that Liberty Mutual disclose certain information to you about our collection and use of your personal information, including a copy of the personal information we have collected. You have the right to know what personal information we collected about you, including the categories of information, the categories of sources from which the information is collected, the business purpose for use or sharing of the information, the categories of third parties to whom we disclosed information, and the specific pieces of information we have collected about you.

You also may have the right to request that Liberty Mutual delete personal information that Liberty Mutual collected from you, subject to certain exceptions. Once Liberty Mutual receives and verifies your request, we will delete your personal information from our systems, unless an exception applies. If applicable, we will also notify third parties, service providers and contractors with whom we may have shared your data of your request for deletion.

To the extent Liberty has your Social Security Number, Driver’s License Number or any other government-issued identification information for you, we do not provide access to this information pursuant to best security practices, CPRA, and any related regulations.

##### **B. Correction**

You may have the right to request that Liberty Mutual correct inaccurate personal information, taking into account the nature of the personal information and the purposes of maintaining your personal information. Upon verifying the validity of a verifiable consumer correction request, we will use commercially reasonable

efforts to correct your personal information as requested.

Liberty Mutual may reject a request for correction if we are unable to verify your identity or if we determine that the contested personal information is more likely than not accurate based on the totality of the circumstances. If necessary, we may request that you provide documentation that the personal information is inaccurate.

### **C. How to Make an Access, Deletion, or Correction Request**

To exercise the access, deletion, or correction rights described above, a verifiable consumer request may be made to Liberty Mutual by either:

- Calling: 800-344-0197
- Online: [www.libertymutualgroup.com/privacy-policy/data-request](http://www.libertymutualgroup.com/privacy-policy/data-request)
- Mail: Liberty Mutual Insurance Company  
175 Berkeley St.,  
Boston, MA 02116  
Attn: Privacy Office

Limited personal information will be required for identity verification purposes. The specific elements may vary depending on the nature of your relationship with Liberty Mutual, but will typically include name, address, phone number, date of birth, last four of your social security number and a description of your relationship with Liberty Mutual.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or deletion twice within a twelve (12) month period. The verifiable consumer request must provide sufficient information that allows Liberty Mutual to reasonably verify that you are the person about whom Liberty Mutual collected personal information or an authorized representative of such person; and describe your request with sufficient detail that allows Liberty Mutual to properly understand, evaluate, and respond to it. If Liberty Mutual is unable to verify you based on the information you have provided and the information contained in our systems, Liberty Mutual will advise you that we cannot complete your request based on inability to verify you.

A California consumer may use an authorized agent to submit a right to know request, a request to delete, or a request to correct. Liberty Mutual may require the authorized agent to provide proof that the consumer gave the agent signed permission to submit the request. In addition, the California consumer may be required to verify their own identity with Liberty Mutual and we may ask you to directly confirm that you provided the authorized agent permission to submit the request.

We may deny a request from an agent that does not submit proof that they have been authorized by the California consumer to act on their behalf. Such requirements, however, will not apply where a California consumer has provided the authorized agent with power of attorney pursuant to Cal. Prob. Code Sections 4121 to 4130. For any questions regarding an authorized agent request, please contact the Liberty Mutual Privacy Office as described in the contact section below.

### **D. Response Timing**

Liberty Mutual endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If more time is needed, Liberty Mutual will inform you of the reason and extension period in writing.

If Liberty Mutual is unable to fulfill your request, you will be provided with the reason that the request cannot be completed.

We may deliver the personal information to you electronically, or by mail at your option. If electronically, then we will deliver the information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information from one entity to another without hindrance.

**VI. Opt-Out Rights**

**A. Rights to opt in and out of information selling/sharing**

Liberty Mutual does not sell the personal information of California consumers.

Liberty Mutual shares your personal information when you visit a Liberty Mutual website. The California privacy law defines sharing as “communicating orally, in writing, or by electronic or other means, a consumer’s personal information . . . to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.” For example, this occurs when you visit a Liberty Mutual website. Cookies or pixels are deployed that then allow us to show you targeted advertisements when you visit other websites or social media platforms.

California consumers may opt-out of sharing personal data for cross-context behavioral advertising. If you opt-out, this means for example that after you visit [libertymutual.com](http://libertymutual.com) you will not see a targeted, personalized ad on a different website or social media platform. Liberty Mutual will accept any of the three options listed below as a valid request to opt-out of sharing.

- (1) Use the Global Privacy Control (“GPC”). This is an opt-out at the browser and device level. For example, if you turn on GPC on your laptop, you have opt-ed out for data collected while on your laptop but not if you visit our website on your phone. You need to turn on GPC for each device. Click [here](#) to learn how to turn on GPC. If you turn on GPC, your opt-out of sharing is accepted automatically.
  
- (2) Click on the Do Not Sell Or Share My Personal Information Link that displays at the bottom of our website. This is an opt-out at the browser and device level. If you visit our website from your laptop and click on the link, we know when you are on that device that you have opted-out. When you visit the device on your phone, you will need to click on the link again to opt-out from that device.

OR

- (3) If you provided Liberty Mutual with your email address during the online quoting process, you can opt-out of sharing by completing a form. Click on [lmi.co/caprivacychoices](http://lmi.co/caprivacychoices) to opt out.

Liberty Mutual will not require you to create an account to exercise your opt-out rights. We may ask you for additional information necessary to complete the opt-out request. We may deny an opt-out request if we have a good-faith, reasonable, and documented belief the request is fraudulent. Upon receipt of your request, Liberty Mutual will not share your personal information with third parties for cross-context advertising within fifteen (15) business days of receiving your request. An authorized agent may submit an opt-out request on your behalf if the agent provides a copy of your signed permission to submit a request on your behalf.

**B. Right to Limit the Use of Sensitive Information**

California consumers have the right to request Liberty Mutual limit the use and disclosure of their sensitive information to that which is necessary to perform the services reasonably expected by an average consumer who requests these services, with some identified exceptions. For example, Liberty Mutual is allowed to use sensitive data (even if you opt-out):

- To perform the services or provide the goods requested by you;

- If it is not used to infer characteristics about you;
- To detect security incidents;
- To resist malicious, fraudulent, deceptive or illegal actions directed at Liberty Mutual;
- To ensure the physical safety of a person;
- For short-term and transient use;
- To perform services on behalf of Liberty Mutual; or
- To verify or maintain the quality of services provided.

To submit a request to limit the use of sensitive data, click on [lmi.co/caprivacychoices](https://lmi.co/caprivacychoices). You may also submit a request to limit by:

Calling: 800-344-0197  
 Email: [Privacy@libertymutual.com](mailto:Privacy@libertymutual.com)  
 Mail: Liberty Mutual Insurance Company  
 175 Berkeley St.  
 Boston, MA 02116  
 Attn: Privacy Office

Upon receiving your request to limit, Liberty Mutual may ask you for additional necessary information to complete your request. A request to limit may be denied if we have a good-faith and reasonable belief that the request is fraudulent. Liberty Mutual will process your request within fifteen (15) business days of receiving your request. You may use an authorized agent to submit a request on your behalf if the authorized agent provides a copy of an employee's signed permission authorizing the agent to submit a request on their behalf.

### **No account needed**

You do not need to create an account with Liberty Mutual to exercise your rights. Liberty Mutual will only use personal information provided in a request to review and comply with the request.

### **No discrimination**

You have the right not to be discriminated against for exercising any of your data privacy rights under California law. Unless permitted by law, Liberty Mutual will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts, other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; and/or
- Suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

## **VII. How to Contact Us**

You can submit requests, seek additional information, or obtain a copy of our Privacy Notice in an alternative format by either:

Calling: 800-344-0197  
 Email: [Privacy@libertymutual.com](mailto:Privacy@libertymutual.com)  
 Online: [www.libertymutualgroup.com/privacy-policy/data-request](https://www.libertymutualgroup.com/privacy-policy/data-request)



Mail: [Lmi.co/caprivacynotices](https://lmi.co/caprivacynotices)  
Liberty Mutual Insurance Company  
175 Berkeley St.  
Boston, MA 02116  
Attn: Privacy Office

#### **VIII. Changes to this Notice**

Liberty Mutual reserves the right to amend this Notice at any time. The “Last Updated” date at the bottom of this Notice indicates when Liberty Mutual last revised this Notice. Any changes will become effective when Liberty Mutual posts the revised Privacy Policy.