

## **Liberty Mutual Group Supplemental CCPA Notice for California Consumers**

**(Effective 1/1/2020)**

This Supplemental CCPA Notice supplements the general Liberty Mutual Privacy Notice information that we provide at or before the point of information collection, and at [www.libertymutual.com/privacy](http://www.libertymutual.com/privacy) for California consumers, as this term is defined in the California Consumer Privacy Act of 2018, as amended (“CCPA”). This Notice is provided on behalf of the Liberty Mutual Group, its affiliates, and subsidiaries (collectively “Liberty Mutual” or “we”, “us” and “our”). This Notice does not apply to employees or job applicants.

### **What Information Did Liberty Mutual Collect?**

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

<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.

### **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 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 agencies, witnesses, experts, loss adjusters, and claim handlers;
- **Social Media:** 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
- **Our subsidiaries and affiliates.**

#### **How Did Liberty Mutual Use This Information?**

In the preceding twelve (12) months, Liberty Mutual collected personal information from California consumers for the following purposes:

- market, sell and provide insurance to California consumers;
- determine your eligibility for a quote;
- calculate your premium;
- administer your claims, if any;
- answer questions and provide notifications;
- support day-to-day business operations and insurance related functions;
- detect security incidents, protecting against fraudulent or illegal activity, and to comply with regulatory and law enforcement authorities;
- confirm your identity and service your policy;
- conduct claims investigations, medical examinations, inspections, appraisals, roadside assistance, rental car replacement, or repairs;
- provide customer and technical support;
- enhance your customer experience and improve our products and services;
- to provide, support, personalize, and develop our website, products and services;
- create, maintain, customize, and secure accounts;
- conduct analytics and measurements to better identify, understand, and manage risk;
- conduct audits related to a current interaction with a consumer and concurrent transactions;
- undertake internal research for technological development;
- develop and offer new products and services;
- market products and services, including with strategic partners;

- exercising and defending our legal rights and positions;
- managing risk and securing our systems, assets, infrastructure, and premises;
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Liberty Mutual’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding in which personal information held by Liberty Mutual about its Website users is among the assets transferred;
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- to fulfill Liberty Mutual contractual obligations;
- to help ensure the safety and security of Liberty Mutual staff, assets, and resources, which may include, but is not limited to, physical and virtual access controls and access rights management; supervisory controls and other monitoring and reviews, as allowed by law; and emergency and business continuity management;
- as described at or before the point of collecting personal information; and as otherwise required by federal or state law.

**With Whom Did Liberty Mutual Share Personal Information**

In the preceding twelve (12) months, Liberty Mutual shared the personal information of California consumers with the following categories of third parties:

- Liberty Mutual affiliates;
- Service Providers;
- Public entities and institutions (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, and fraud prevention agencies);
- Professional advisors including law firms, accountants, auditors, and tax advisors; and
- Insurers, re-insurers, policy holders, and claimants.

**Categories of Personal Information Disclosed for a Business Purpose**

In the preceding twelve (12) months, Liberty Mutual has not sold personal information regarding California consumers.

In the preceding twelve (12) months, Liberty Mutual disclosed the following categories of personal information regarding California residents for a business purpose:

Identifiers	Personal Information
Protected Classification Characteristics	Inferences drawn from other personal information
Internet or other similar network activity	Professional or employment related information
Commercial Information	Risk Data
Claims Data	Transaction Data

**California Consumer Rights Under the CCPA**

The CCPA provides California consumers with specific rights regarding 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.

**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 in the twelve (12) months preceding such request, including a copy of the personal information we have collected. You also may have the right to request that Liberty Mutual delete personal information that Liberty Mutual collected from you, subject to certain exceptions.

Specifically, you have the right to request that we disclose the following to you, in each case, in the twelve (12) month period preceding your request:

- the categories of personal information we have collected about you;
- the categories of sources from which the personal information was/is collected;
- our business or commercial purpose for collecting personal information;
- the categories of third parties with whom we share personal information;
- the specific pieces of information we have collected about you;
- the categories of personal information about you, if any, that we have disclosed for monetary or other valuable consideration, and the categories of third parties to which we have disclosed the information, by category or categories of personal information for each third party to which we disclosed the personal information; and
- the categories of personal information about you that we disclosed for a business purpose.

**You can submit requests 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., 6<sup>th</sup> Floor  
Boston, MA 02116  
Attn: Privacy Office

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 data portability 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.

**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.

Any disclosures that will be provided will only cover the twelve (12) month period preceding our receipt of the verifiable consumer request. 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 through your account, if you maintain an account with us, or 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.

Liberty Mutual does not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If Liberty Mutual determines that the request warrants a fee, you will be told the reason this decision was made, and we will provide you with a cost estimate before completing your request.

### **Rights to opt in and out of information selling**

California consumers have the right to direct businesses not to sell your personal information (opt-out rights), and personal information of minors under 16 years of age will not be sold, as is their right, without theirs or their parents' opt-in consent. Liberty Mutual does not sell the personal information of consumers.

### **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 CCPA rights. Unless permitted by the CCPA, 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
- Suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

### **Will Liberty Mutual Update This Privacy Notice?**

We reserve the right to make changes to this notice at any time and for any reason. The updated version of this policy will be effective once it is accessible. You are responsible for reviewing this policy to stay informed of any changes or updates.

### **Who Do I Contact Regarding Privacy?**

If you have any questions or comments about this Supplemental CCPA Notice, the general Liberty Mutual Privacy Notice, or your rights, please do not hesitate to contact Liberty Mutual at:

**Phone:** 800-344-0197  
**Email:** [privacy@libertymutual.com](mailto:privacy@libertymutual.com)  
**Postal Address:** Liberty Mutual Insurance Company  
175 Berkeley St., 6<sup>th</sup> Floor  
Boston, MA 02116  
Attn: Privacy Office