Privacy Notice for Telematics Applications
Effective July 2024

Liberty Mutual Group and its affiliates, subsidiaries, and partners, including Safeco, (collectively "Liberty Mutual" or "we", "us" and "our") are dedicated to "Helping People Live Safer, More Secure Lives," including preserving your privacy on our website. In this privacy notice, we explain how we collect, process, use, and disclose information gathered from your use of the Telematics functionalities in our Mobile Applications. The use of Telematics functionalities is a voluntary, usage-based insurance program that utilizes driving data to determine the participants' insurance policy pricing and provides additional services.

What Personal Data Do We Collect?

- **Identifiers**, such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, vehicle identification number, or other similar identifiers;
- **Personal data**, such as your name, address, telephone number, insurance policy number, or financial data.
- **Protected classification characteristics described in California Civil Code § 1798.80(e)**
- **Internet or other similar network activity**, such as data about a consumer's interaction with the application or mobile device information;
- **Inferences drawn from other personal data**, such as a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes;
- **Telematics and Geolocation Data,** such as mileage, time of day, acceleration, braking, location, trip types, phone motion, ignition data, odometer, speed, idle time, battery time, fuel consumption, air consumption, or technology diagnostics.

How Do We Use Your Personal Data?
Liberty Mutual uses your data to provide you our products and services and as otherwise provided in this notice. We may use your data and the data of our former customers for our business purposes. We do not sell your personal data. Our business purposes include:

Business Purpose	Data Categories
Market, sell and provide insurance. This includes, for example: • calculating your premium; • determining your eligibility for a quote; • confirming your identity and servicing your policy;	▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Internet or other similar network activity ▪ Inferences drawn from other personal information ▪ Telematics and Geolocation Data
Manage your claim. This includes, for example: ▪ managing your claim, if any; ▪ conducting claims investigations; ▪ conducting inspections, appraisals; ▪ providing roadside assistance; ▪ providing rental car replacement or repairs;	▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Internet or other similar network activity ▪ Inferences drawn from other personal information ▪ Telematics and Geolocation Data
Day to Day Business and Insurance Operations. This includes, for example: • creating, maintaining, customizing, and securing accounts; • supporting day-to-day business and insurance related functions; • doing internal research for technology and development; • marketing and creating products and services; • conducting audits related to a current contact with a consumer and other transactions;	▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Internet or other similar network activity ▪ Inferences drawn from other personal information ▪ Telematics and Geolocation Data

as described at or before the point of gathering personal data or with your authorization;	
Security and Fraud Detection. This includes, for example: ▪ detecting security issues; ▪ protecting against fraud or illegal activity, and to comply with regulatory and law enforcement authorities; ▪ managing risk and securing our systems, assets, infrastructure, and premises; ▪ help to ensure the safety and security of Liberty staff, assets, and resources, which may include physical and virtual access controls and access rights management; ▪ supervisory controls and other monitoring and reviews, as permitted by law; and emergency and business continuity management;	▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Internet or other similar network activity ▪ Inferences drawn from other personal information ▪ Telematics and Geolocation Data
Regulatory and Legal Requirements. This includes for example: ▪ controls and access rights management; ▪ to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Liberty's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by Liberty is among the assets transferred; ▪ exercising and defending our legal rights and positions; ▪ to meet Liberty contract obligations; ▪ to respond to law enforcement requests as required by applicable law, court order, or governmental regulations; ▪ as otherwise permitted by law;	▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Internet or other similar network activity ▪ Inferences drawn from other personal information ▪ Telematics and Geolocation Data
Improve Your Customer Experience and Our Products. This includes, for example: ● improve your customer experience, our products, and service; ● to provide support, personalize, and develop our website, products, and services; ● create and offer new products and services;	▪ Identifiers ▪ Personal Information ▪ Internet or other similar network activity ▪ Inferences drawn from other personal information ▪ Telematics and Geolocation Data
Analytics to identify, understand, and manage our risks and products. This includes, for example: ● conducting analytics to better identify, understand, and manage risk and our products.	▪ Identifiers ▪ Personal Information ▪ Protected Classification Characteristics ▪ Internet or other similar network activity ▪ Inferences drawn from other personal information ▪ Telematics and Geolocation Data
Customer service and technical support. This includes, for example: ● answer questions and provide notifications;	▪ Identifiers ▪ Personal Information ▪ Internet or other similar network activity

2

• provide customer and technical support.	▪ Inferences drawn from other personal information ▪ Telematics and Geolocation Data

Do We Share Your Personal Data?

Liberty Mutual may share personal data with affiliated and non-affiliated third parties, including:

- Liberty Mutual affiliates;
- Service Providers;
- Insurance support organizations;
- Brokers and agents;
- Public entities (e.g. regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, and fraud prevention agencies);
- Consumer reporting agencies;
- Advisors including law firms, accountants, auditors, and tax advisors;
- Insurers, re-insurers, policy holders, and claimants;
- Group policyholders (for reporting claims data or an audit);
- Service providers and affiliates for actuarial or research studies; and
- As permitted by law.

We may also share data with other companies that provide marketing services on our behalf or as part of a joint marketing agreement for products offered by Liberty Mutual. We will not share your personal data with others for their own marketing purposes.

Changes to this Notice
Changes to this Notice will be posted here. Website visitors who are not policyholders should refer to the date at the top of this notice to see if it has been updated.

What Rights Do I Have to Learn More About My Personal Data?
If you are a California resident, you may have additional rights to learn more about our privacy practices.

For more information about these rights, please go to libertymutual.com/privacy and click on the link California Supplemental Privacy Notice. If you cannot access the link, please contact us.

How to Contact Us:
You can additional information, or obtain a copy of our Privacy Notice in an alternative format by either:

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

3