<u>Liberty Mutual Group California Privacy Notice</u> California Third Parties (Effective January 1, 2023)

Liberty Mutual Group and its affiliates, subsidiaries, and partners (collectively "Liberty Mutual" or "we", "us" and "our") provide insurance to individuals, companies and other insurers. This Privacy Notice pertains to you if you are a **California resident who does not have an insurance policy with us and is not seeking information about obtaining a policy**. For example, if may apply if you witnessed an accident or are insured by another company but are filing a claim against a Liberty Mutual policyholder. In this notice, we explain how we gather, use and share your data. For more information regarding our privacy policies and your rights as a California resident, please refer to our California Privacy Policy (Consumers) at <u>lmi.co/caprivacynotices</u>.

What Personal Data Do We Collect?

The types of personal data we gather and share depends on both the product and your relationship to us. For example, we may gather different data if you are a claimant reporting an injury than if you are a witness to an accident.

We may collect:

- Identifiers, including a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, or other similar identifiers;
- **Personal data**, such as your name, signature, Social Security Number, physical characteristics or description, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, financial data, precise geolocation, medical data, or health insurance data;
- Protected classification characteristics described in California Civil Code § 1798.80(e), including age, 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, veteran, or military status;
- **Commercial information**, including 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, including browsing history, search history, data about a consumer's interaction with a website, application, or advertisement;
- Professional or employment related information, including current or past job history
- 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;
- **Risk data**, including data about your driving and/or accident history; this may include data from your insurance company and from consumer reporting agencies, such as your motor vehicle records and loss history information, health data, or criminal offenses;
- **Claims data**, including information about your previous and current claims, which may include information regarding your health, criminal convictions, third party reports, other personal information, or any other information relevant to the claim you are presenting, or any past claims you may have filed; and
- Sensitive Data as defined under the California Privacy Rights Act when used to infer characteristics of an individual.

For information about the types of personal data we have collected in the past twelve months, please go to <u>lmi.co/caprivacynotices</u> and click on the link for the California Privacy Policy (Consumers).

How do you gather my data?

We gather your personal data directly from you . For example, you provide us with data when you:	We also gather your personal data from other people . For example:
• file a claim	 your insurance agent or broker
• visit our websites, call us, or visit our office	 your employer, association, or business (if you are insured through them)
	 our affiliates or other insurance companies about your transactions with them
	 consumer reporting agencies, Motor Vehicle Departments and inspection services, to gather your credit history, driving record, claims history, or value and condition of your property
	 other public directories and sources
	 third parties, including other insurers, brokers and insurance support organizations who you have communicated with about your policy or claim, anti-fraud databases, sanctions lists, court judgments and other databases, government agencies, open electoral register, or in the event of a claim, third parties including other parties to the claim, witnesses, experts, loss adjustors, and claim handlers
	 other third parties who take out a policy with us and are required to provide your data, such as when you are named as a beneficiary or where a family member has taken out a policy that requires your personal data

Organizations that share data with us may keep it and disclose_it to others as permitted by law. For data about how we have gathered personal data in the past twelve months, please go to <u>lmi.co/caprivacynotices</u> and click on the link for the California Privacy Policy (Consumers).

How Do We Use Your Personal Data?

Liberty Mutual uses your data for a limited number of uses described in this Notice. We may use your data for our business and other compatible_purposes. Our business purposes include, for example:

Business Purpose	Data Categories	Do we share or sell your information
	_	as defined by CPRA
Manage your claim. This includes, for	 Identifiers 	No.
example:	 Personal Information 	
 managing your claim, if any; 	 Protected Classification 	
 conducting claims 	Characteristics	
investigations;	 Commercial Information 	
 conducting medical 	 Internet or other similar 	
examinations;	network activity	
 conducting inspections, 	 Professional or employment 	
appraisals;	related information	
 providing roadside assistance; 	 Inferences drawn from other 	
 providing rental car replacement 	personal information	
or repairs;	 Risk data 	
	 Claims data; 	
	 Sensitive Data. 	

Version 2 (Last Updated November 2022)

 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; and as described at or before the point of gathering personal data or with your authorization. 	 Identifiers Personal Information Protected Classification Characteristics Commercial Information Internet or other similar network activity Professional or employment related information Inferences drawn from other personal information Risk data Claims data 	No.
 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 Commercial Information Internet or other similar network activity Professional or employment related information Inferences drawn from other personal information Risk data Claims data 	No.
 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 	 Identifiers Personal Information Protected Classification Characteristics Commercial Information Internet or other similar network activity Professional or employment related information Inferences drawn from other personal information Risk data Claims data 	No.

Version 2 (Last Updated November 2022)

 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; 		
Improve Your Customer Experience	 Identifiers 	No.
and Our Products. This includes, for	Personal Information	110.
example:	 Commercial Information 	
improve your customer	Internet or other similar	
experience, our products, and	network activity	
service;	Professional or employment	
to provide support, personalize,	related information	
• to provide support, personanze, and develop our website,	 Inferences drawn from other 	
products, and services;	personal information	
 create and offer new products 	Risk data	
• create and other new products and services;	Claims data	
Analytics to identify, understand, and	 Identifiers 	No.
	IdentifiersPersonal Information	110.
manage our risks and products. This includes, for example:	Protected Classification	
<u>^</u>	- Protected Classification Characteristics	
 conducting analytics to better identify understand and 	Commercial Information	
identify, understand, and	Internet or other similar	
manage risk and our products;	network activity	
	Professional or employment	
	related information	
	 Inferences drawn from other 	
	 Interences drawn from other personal information 	
	Risk data	
	Claims data	
	Claims dataSensitive Data	
Customer service and technical	 Sensitive Data Identifiers 	No.
support. This includes, for example:	IdentifiersPersonal Information	110.
answer questions and provide	Commercial Information	
 answer questions and provide notifications; 	Internet or other similar	
	network activity	
• provide customer and technical	Professional or employment	
support.	related information	
	 Inferences drawn from other 	
	personal information	
	Risk data	
	Claims data	
Cross-Context Behavioral	 Identifiers 	We share this information with service
Advertising	ID address	providers such as search engines and
	In addressInternet or other similar	
		social media platforms.
	network activity	

Liberty Mutual will not collect additional categories of personal information or use the personal information we collected for materially unrelated, or incompatible purposes without updating our notice.

Do We Disclose Your Personal Data?

Liberty Mutual does not sell your personal data as defined by California law.

Liberty Mutual shares your personal data as disclosed above. 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. You have the right to opt-out of this type of sharing and you may learn more about those rights at <u>lmi.co/caprivacychoices</u>.

This type of sharing is different from disclosing personal information to other entities to perform a service related to providing insurance or processing your claim. How we disclose data to these types of entities is set forth below.

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

- Liberty Mutual affiliates;
- Service Providers (such as auto repair facilities, towing companies, property inspectors, and independent adjusters);
- 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);
- A person, organization, affiliates or service providers conducting actuarial or research studies; and
- As permitted by law.

We may also disclose 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 disclose your personal data with others for their own marketing purposes.

We may also disclose data about our transactions (such as payment history) and experiences (such as claims made) with you to our affiliates.

Liberty Mutual may disclose the following categories of personal data as needed for business purposes:

Identifiers	Personal Data
Protected Classification Characteristics	Commercial Data
Internet or other similar network activity	Professional, employment, and education data
Inferences drawn from personal data	Risk Data
Claims Data	

For information about how we have shared personal data in the past twelve months, please go to <u>lmi.co/caprivacynotices</u> and click on the link for the California Privacy Policy (Consumers).

How Long Does Liberty Mutual Retain Each Category of Personal Data?

We retain your information in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law. For example, we may have a legal obligation to retain information relating to your policies or claims with us. We will delete your data once the legal obligation expires or after the period of time specified in our records retention policies. The period of retention is subject to our review and alteration.

Version 2 (Last Updated November 2022)

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
Website:	libertymutual.com/privacy
Email: Postal Address:	Imi.co/caprivacychoices privacy@libertymutual.com Liberty Mutual Insurance Company 175 Berkeley St., 6 th Floor Boston, MA 02116 Attn: Privacy Office