

Vantage Privacy Policy

Last Updated: November 2023

Vantage Group Holdings Ltd. and its subsidiaries (collectively, “Vantage”) takes your privacy seriously. Please carefully read this Privacy Policy (“Privacy Policy” or “Policy”) to familiarize yourself with our privacy practices regarding your personal information and how we will use it. By using our Sites and Services (defined below), you consent to us collecting, using, and storing your data as described in this Privacy Policy and our [Disclaimer and Terms of Use Agreement](#). If you do not agree to these terms, please do not use our Sites and Services.

This Privacy Policy applies to Vantage’s website and all related websites (“Sites”), mobile applications, email communications, and all (re)insurance and other services, activities and solutions owned, operated or provided by Vantage (“Services,” and collectively, “Sites and Services”). Vantage’s social media platforms may use services such as Facebook, LinkedIn, and Twitter. This Privacy Policy does not apply to any social media platform provider, but does apply to any personal information Vantage may receive or have access to through such platforms.

To make this document more readable, “Company”, “we”, “us”, and “our” refer to Vantage. “You” and “your” refers to anybody using our Sites and Services.

This Privacy Policy describes how Vantage collects and uses your personal information provided to us in connection with the Sites and Services, either directly by you or on your behalf. It also describes the rights residents of certain states and jurisdictions may have regarding their personal information.

We may revise this Privacy Policy from time to time. We will post any changes on this page and update the date at the top. Your continued use of our Sites and Services after changes have been posted will constitute your acceptance of this Privacy Policy and any changes.

Additional Notice to California Residents

Personal Information We Collect

We may collect information that identifies an individual or from which an individual can be directly or indirectly identified (“personal information”). Personal information does not include publicly available information from government records, or deidentified or aggregated information.

We may collect personal information about you either directly from you, including through your use of the Sites and Services, or through your agents or representatives or other third parties involved in our business dealings with you. The personal information we may collect depends on our relationship or interaction with you (for example, applicant for coverage; policyholder or insured person under another policyholder’s policy; claimant or beneficiary under an insurance policy; commercial broker or appointed representative; or other person relating to our business).

Personal information we may collect, includes:

- An individual's name, age, date or place of birth, physical address, email address, account name, phone or other contact details, Social Security number, driver's license or government issued identification number, passport number, signature, physical characteristics or description, (re)insurance policy information, financial information, or other similar identifiers or personal information;
- Other sensitive information such as race, ethnicity, ancestry, national origin, citizenship, political opinions, religious or philosophical beliefs, trade union membership, marital status, medical condition, physical or mental health, disability, sex (including gender, gender identity, gender expression, pregnancy/childbirth and related medical status), sexual orientation, veteran or military status, biometric or genetic information, and criminal convictions;
- Information about a person's professional, employment or educational background, such as current or past job history, qualifications, degrees obtained, licensing, and disciplinary record; and
- Online identifiers (e.g., Internet Protocol address, including approximate physical location derived therefrom), internet or other electronic network activity regarding your interaction with our Sites and Services, social media pages, applications or advertisements.

How We Use Personal Information

Vantage may use personal information as may be necessary to operate our business, including:

- Service your (re)insurance needs, including to process applications for coverage and/or claims submitted relating to Vantage products and services or to confirm or correct information you have submitted;
- Personalize your experience while using Vantage's Sites and Services or other digital platforms;
- Contact you, or send information you have asked to receive about Vantage products and services, or for other business reasons;
- Update you with news and other information about Vantage, including marketing materials;
- Conduct research and data analytics to support Vantage's risk management and operational purposes, including actuarial analysis and the development of actuarial and pricing tools and models;
- Protect Vantage's privacy and property, as well as the privacy and property of you or others;

- Resolve complaints and handle any requests for access to, deletion or correction of your personal information;
- Prevent, detect and investigate fraud and other activities that violate our terms or that are illegal;
- Comply with laws and legal processes, including responding to court, regulatory or governmental requests;
- As otherwise allowed, or required, by applicable law including laws other than those of your location;
- In any other way we may describe when you provide the information.

We also may anonymize, combine or aggregate any of the information we collect for any of these purposes, or to analyze trends or statistics or to provide risk management or (re)insurance services to our clients.

How We May Disclose Personal Information

Vantage does not sell your personal information or provide it to third-parties for their direct marketing purposes. We may disclose personal information that we collect, or you provide as described in this Privacy Policy under the following circumstances:

- To transfer data to our affiliates from time to time for our business purposes. Affiliates are defined as subsidiaries, parent companies, joint ventures, and other corporate entities under common Vantage ownership.
- To contractors, service providers and other third parties, that assist us with underwriting and servicing our (re)insurance products, including (re)insurance brokers or other intermediaries, other insurance companies, people and entities who assist in the investigation, adjusting, settlement and payment of claims, including third parties, witnesses, or healthcare providers, and third parties to help detect and protect against fraud or data security vulnerabilities.
- To a buyer, investor, or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Vantage's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Vantage about our Website users is among the assets transferred.
- To fulfil the purpose for which you provide it.
- As otherwise permitted or required by law, including to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities.

Security

We are committed to maintaining your confidence and trust and take steps to help protect the personal information you provide to us. However, no transmission or electronic storage of information is guaranteed to be secure. We therefore urge you to always use caution when transmitting information over the internet.

Your Privacy Rights

Depending on your location, you may have certain rights with respect to your personal information that we hold about you. These rights may include the right to request access to, correction and/or deletion of your personal information or limitation of the use of your personal information. If you wish to exercise any applicable rights or have any other inquiries or complaints in relation to your personal information, please refer to the "Contact Us" section below.

International Transfers

Our Site is hosted in the United States. All personal information you submit to us via the Site will be transferred to the United States.

By providing personal information and other information to Vantage, including through the Sites and Services, and/or by sending a communication to a "vantagerisk.com" e-mail address, you understand and consent to the collection, use, processing disclosure and transfer of such information in the United States and other countries or territories in accordance with the terms of this Privacy Policy, which may not offer the same level of data protection as the country where you reside. Further, please note that any communication you send to a "vantagerisk.com" e-mail address will be routed through the United States.

Choices about the Collection and Use of Your Information

Vantage and its service providers may collect "cookies" or other online tracking devices (e.g., web beacons) that recognize you. A cookie is a piece of information stored on the device you are using to access Vantage's Sites and Services. Vantage uses cookies and other tracking devices for security purposes, as well as to help in navigation and enhance your viewing experience. Cookies also let Vantage select which of Vantage's advertisements or offers are most likely to appeal to you. These are then displayed while you are using Vantage's Sites and Services or other digital platforms. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org.

We may contract with third-parties who may use cookies and web beacons and collect information on our behalf or provide services such as promotional services, data management, or website troubleshooting and analytics. These third-parties are prohibited by our contract with them from sharing that information with anyone other than us or our other vendors who provide similar services.

We use Google Analytics to evaluate the use of our website. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit a website, what pages they visit when they do so, and what other websites they visited prior to visiting a website. To learn more about how Google Analytics collects personal information, review [Google's Privacy Policy](#)

If you do not want information collected through the use of cookies, you may opt-out of receiving cookies by changing your internet browser settings.

Third-party Services and Websites

Vantage's Sites and Services may sometimes include links to third-party websites. This Privacy Policy does not apply to information you provide to third-party websites. Vantage is not responsible for the privacy or other practices, including security practices, of any third-party website, nor does a link to a third-party website within Vantage's services mean that Vantage endorses these websites or the services they provide. Accordingly, we recommend that you review the privacy policies posted on any website that you may access through our Sites and Services.

Collection of Information from Children

Vantage does not knowingly collect personal information from anyone under the age of 13.

Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us via the information in the "Contact Us" section below.

Feedback or Questions

If you have questions or comments, please refer to the "Contact Us" section below.

Contact Us

If there are any questions regarding this Policy, or to request a copy of this Policy in another format, you may contact us using any of the methods below:

- Phone: 833-552-1772.
- E-mail: inquiries@vantagerisk.com
- Mail: Vantage Services LLC
123 North Wacker Dr., Suite 1300
Chicago, IL 60606

California Privacy Rights and Disclosure

If you are a California resident, you may have separate rights regarding your personal information, in accordance with California law, including the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively the “CCPA”). The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a California consumer or household.

Personal information does not include publicly available information from federal, state or local government records; de-identified or aggregated consumer information; or information excluded from the CCPA’s scope, such as personal information covered by the Fair Credit Reporting Act, or processed pursuant to the Gramm-Leach-Bliley Act, California Financial Information Privacy Act or the Driver’s Privacy Protection Act of 1994 if in conflict with such acts and their implementing regulations.

The personal information we may collect depends on our relationship or interaction with you (for example, applicant for coverage; policyholder or insured person under another policyholder’s policy; claimant or beneficiary under an insurance policy; commercial broker or appointed representative; or other person relating to our business).

This Notice applies solely to California residents and supplements the information contained in our Privacy Policy, which we encourage you to also read for information regarding our practices, including with respect to third party services used on our sites, our use of cookies and our recognition of supported privacy browser signals. This notice does not apply to the collection and use of personal information in the context of recruiting or employment, which is subject to separate privacy notices.

Notice at Collection: Personal Information We Collect and Have Collected in the Past 12 Months

We collect the following categories of personal information and have collected it in the 12 months prior to the date of this Policy:

| CCPA Category | Description |
|-----------------------------------|--|
| Personal Identifiers | name, date or place of birth, physical address, email address, unique personal identifier, account name, Social Security number, driver’s license or state identification card number, passport number, signature, physical characteristics or description, (re)insurance policy account number |
| Personal Information described in | A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, any other financial information, |

| | |
|--|---|
| Cal. Civ. Code § 1798.80(e) | medical information or health insurance information. Some personal information included in this category may overlap with other categories. |
| Protected Class Information | Age (40 and over), race, ethnicity, ancestry, national origin, citizenship, trade union membership, marital status, medical condition, disability, sex (including gender, gender identity, gender expression, pregnancy/childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information, requests for family, medical or other protected leave. |
| Commercial Information | Records of (re)insurance products purchased or services received in connection with (re)insurance products issued by us. |
| Internet or other electronic activity information | online identifiers (e.g., internet Protocol address), Internet or other electronic network activity regarding interaction with our Sites and Services, social media pages, applications or advertisements. |
| Audio, electronic, visual, thermal, olfactory or similar information | Security footage at our physical office locations, recordings of audio or video calls or messages. |
| Professional or employment information | Current or past job history or performance evaluations, professional licenses or certifications, immigration status. |
| Education information | Educational institutions attended, degrees or certifications obtained, continuing education information, grades, transcripts. |
| Sensitive Personal information | Social Security number, driver's license, passport number, racial or ethnic origin, religious or philosophical beliefs, political opinions, union membership, genetic data, information about an individual's health, medical information (if concerning health or sexual orientation). |

Notice at Collection: Purposes for Collection and Disclosure of Personal Information

Vantage uses the personal information to operate its business, including as may be necessary to:

- Service your (re)insurance needs, including to process applications for coverage and/or claims submitted relating to Vantage products and services or to confirm or correct information you have submitted;
- Personalize your experience while using Vantage's Sites and Services or other digital platforms;
- Contact you, or send information you have asked to receive about Vantage products and services, or for other business reasons;
- Update you with news and other information about the Company, including marketing materials;
- Conduct research and data analytics to support Vantage's risk management and operational purposes, including actuarial analysis and the development of actuarial and pricing tools and models;
- Protect Vantage's privacy and property, as well as the privacy and property of you or others;
- Resolve complaints and handle any requests for access to, deletion or correction of your personal information;
- Prevent, detect and investigate fraud and other activities that violate our terms or that are illegal;
- Comply with laws and legal processes, including responding to court, regulatory or governmental requests;
- As otherwise allowed, or required, by applicable law including laws other than those of your location; and
- In any other way we may describe when you provide the information.

Any sensitive personal information is only used or disclosed as necessary for the business purposes described above.

We also may anonymize, combine or aggregate any of the information we collect for any of these purposes, or to analyze trends or statistics or to provide risk management or (re)insurance services to our clients.

Notice at Collection: Personal Information We Have Disclosed for Business Purposes in the Past 12 Months

The categories of personal information we have disclosed for a business purpose in the preceding twelve (12) months include: personal identifiers, Personal Information described in Cal. Civ. Code § 1798.80(e), protected class information, commercial information, internet or other electronic activity information, audio, electronic, visual, thermal, olfactory or similar information, professional or employment information, education information and sensitive personal information.

With respect to **personal identifiers, Personal Information described in Cal. Civ. Code § 1798.80(e), protected class information, commercial information, professional or employment information, education information and sensitive personal information**, the categories of third parties and other recipients to whom we have disclosed such personal information for a business purpose include entities, including our subsidiaries and affiliates, that:

- assist us in underwriting and servicing our (re)insurance products, including adjusting and paying claims;
- assist us in operating, analyzing, and displaying content on our website;
- assist us in analyzing, organizing, and maintaining financial and (re)insurance information;
- conduct research and data analytics;
- advertise or market our products;
- provide legal and accounting services; and
- provide data security services and cloud-based data storage.

We have also disclosed **internet or other electronic activity information** to entities, including our subsidiaries and affiliates, that: provide data security services and cloud-based data storage; host our Sites and provide other IT-related services; provide website hosting, webcast and teleconference services; advertise and market our products; and conduct research and data analytics.

We have also disclosed **audio, electronic, visual, thermal, olfactory or similar information** to entities that provide data security services and cloud-based data storage.

Additional Information About How We May Disclose Personal Information

We may also disclose personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also disclose personal information to third parties to help detect

and protect against fraud or data security vulnerabilities. We may also disclose or transfer personal information to a third party in the event of an actual or potential sale, merger, reorganization of our entity or other restructuring.

Notice at Collection: Categories of Personal Information We Sell or Share and Related Information

Vantage does not sell personal information, nor does it share personal information for purposes of cross-context behavioral marketing.

Notice at Collection: Retention Periods

We retain the categories of personal information we collect for the length of time necessary to provide our Sites and Services and to comply with legal obligations or to protect our legal rights.

Sources of Collection

In the 12 months preceding the date of this Policy, we collected your personal information when you used our Sites and Services. We also collect personal information about you either directly from you, or through your agents or representatives or other third parties involved in our business dealings with you. We also collect personal information from entities that assist us with underwriting and servicing our (re)insurance products, including (re)insurance brokers or other intermediaries, insurance companies for whom we provide, or from whom we purchase, (re)insurance, people and entities who assist in the investigation, adjusting, settlement and payment of claims, including third parties, witnesses, or healthcare providers.

Your Rights Under the CCPA

The CCPA gives California residents rights described below with respect to their personal information.

Your Right to Request Disclosure of Information We Collect About You

You can ask us for any or all of following information regarding the personal information we have collected about you in the 12 months prior to our receipt of your request:

- Specific pieces of personal information we have collected about you;
- Categories of personal information we have collected about you;
- Categories of sources from which such personal information was collected;
- Categories of personal information that we sold or disclosed for a business purpose about you;

- Categories of third-parties to whom your personal information was sold or disclosed for a business purpose; and
- The business or commercial purpose for collecting or selling your personal information.

Your Right to Request Deletion of Personal Information We Have Collected About You

Upon your request, we will delete the personal information we have collected about you, except for situations where the CCPA authorizes us to retain specific information, including when it is necessary for us to provide you with a good or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; or comply with or exercise rights provided by the law. The law also permits us to retain specific information for our exclusively internal use, but only in ways that are compatible with the context in which you provided the information to us or that are reasonably aligned with your expectations based on your relationship with us. We will act on your deletion request within the timeframes set forth below.

Your Right to Correct Your Personal Information

You have the right to request that we correct personal information we hold that you believe is not accurate. We will take steps to determine the accuracy of the personal information that is the subject of your request to correct, and in doing so will consider the totality of the circumstances relating to the personal information you have identified as being incorrect. We may ask that you provide documentation regarding your request to correct in order to assist us in evaluating the request.

Sale of Personal Information

As explained above, we do not sell your personal information, nor do we knowingly sell the personal information of minors under the age of 16.

Exercising Your Rights and How We Will Respond

To exercise any of the rights above, or to ask a question, contact us at 833-552-1772 or email us at inquiries@vantagerisk.com.

For requests for access, deletion, or correction, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will provide a substantive response to your request as soon as we can, and generally within 45 days from when we receive your request; although we may be allowed to take longer to process your request under certain circumstances. If we expect that your request will take us longer than normal to fulfill, we will let you know.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations. In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavor to provide you with an explanation as to why.

Our Commitment to Respect Your Rights

If you exercise any of the rights explained in this Policy, we will continue to treat you fairly. If you exercise your rights under this Policy, you will not be denied or charged different prices or rates for goods or services, or provided a different level or quality of goods or services than others.

Verification of Identity – Access or Deletion Requests

We will ask you for identifying information and attempt to match it to information that we maintain about you.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to your request. We will notify you to explain the basis of the denial.

Authorized Agents

You may designate an agent to submit requests on your behalf.

If you would like to designate an agent to act on your behalf, the agent will be required to provide us with proof of the agent's identity and proof that you gave the agent signed permission to submit a request on your behalf. Additionally, you will be required to verify your identity by providing us with certain personal information as described above or provide us with written confirmation that you have authorized the agent to act on your behalf.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.

California Do Not Track

Some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked. At this time, our Sites do not respond to browsers' do not track signals.