

# PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Effective January 1, 2020

## IMPORTANT PRIVACY NOTICE REGARDING YOUR NONPUBLIC PERSONAL INFORMATION

### Why do we have this Notice?

This PRIVACY NOTICE FOR CALIFORNIA CONSUMERS applies only to residents of the State of California. We are providing you with this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), other California privacy laws, and the Gramm-Leach-Bliley Act ("GLBA"). Any terms defined in the CCPA and GLBA have the same meaning when used in this notice. You have the right to control whether we share some of your personal information. Please read the following information carefully before you make your choices.

### What are Your Rights and Choices?

Under the CCPA California Consumers have specific rights regarding their personal information.

- You have the right to know types of personal information we collect, use, disclose or sell.
- You have the right to request that we delete certain types of personal information.
- You have the right to opt-out of the sale of personal information.
- You have the right not to receive discriminatory treatment by us for exercising the privacy rights conferred by the CCPA.
- You have the right to designate an authorized agent to make requests under the CCPA on your behalf.

### What personal information do we collect?

Category	Examples	Collected
A. Identifiers	Name, alias, postal address, unique personal identifier, Internet Protocol ("IP") address, email address, etc.	Yes
B. Personal Information Categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)).	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, or any other financial information, medical information or health insurance information. Some personal information included in this category may overlap with other categories.	We only collect name, address, telephone number, email address, insurance policy number and payment information.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, 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	No
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No

E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	No
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations	No
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232(g), 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

Personal information does not include publicly available information that is from federal, state, or local government records.

### **How do we collect this personal information?**

We may collect your personal information, when you:

- Request an insurance quote
- Apply for insurance, pay premiums, or make changes to your policy
- File a claim
- Provide employment information
- Fill out customer surveys
- Speak with us by phone, in person, by email or by visiting our website or mobile app

We may also collect personal information from others, such as affiliates, or joint marketing partners or lead providers.

### **How might we use or disclose your personal information?**

We do not sell your personal information to anyone, for any reason. But all financial companies need to share customers' personal information to run their everyday business. As such, Trupanion may collect, use or disclose your personal information for the following purposes:

- To provide you with our services, including providing you quotes, enrollment information, and customer support;
- To communicate with you about your insurance policy, including your enrollment, your rates, your claims, your renewal, and your coverage;
- To communicate with you about new features or information available from Trupanion;

- To improve our website and the content and features available to you, including to debug and to identify and repair errors that impair existing intended functionality on the Trupanion Website;
- To investigate, evaluate and pay claims, including communicating with animal hospitals that have treated your pet to collect your pets medical records and notify them of claims decisions; inquiring with animal hospitals to determine if those hospitals had treated your pet; communicating with breeders, shelters, or other third parties who may have information about your pet necessary to determine coverage or pay claims;
- To assist a third party in the performance of a business, professional or other insurance function on our behalf;
- To detect or prevent criminal activity, fraud, material misrepresentation or material non-disclosure in connection with an insurance transaction;
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity;
- To conduct actuarial or business analysis, or to conduct an audit of our operations;
- To carry out our obligations and enforce our rights arising from insurance policies issued by us;
- To evaluate or conduct a merger, divestiture, acquisition, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred;
- To share with our attorneys, accountants, auditors or other professional advisors; and
- For legal reasons, including in connection with pending litigation, to comply with applicable laws and regulatory requirements, to respond to law enforcement requests, governmental agencies, or court orders.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **How long do you retain my Personal Information?**

How long we retain your personal information depends on the purpose for which it was obtained and its nature. We will keep your personal information for no more than the time required to fulfil the purposes described in this privacy notice unless a longer retention period is permitted by law.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

### **How do I Opt-Out of you Selling or Sharing my Personal Information?**

We do not sell your personal information to anyone, for any reason. We only share information for the reasons listed above. Should you wish to Opt-out of receiving marketing communications from Trupanion, please contact us at (855) 587-7715, email us at [CaliforniaPrivacy@trupanion.com](mailto:CaliforniaPrivacy@trupanion.com) or complete an Opt-Out form. Please include your name, address, telephone number, and policy number (if applicable) for these requests.

### **How do we protect your personal information?**

We use a number of security measures to protect your personal information from unauthorized access and use. These measures include organizational, technological, contractual and other measures such as computer safeguards and secured files and buildings.

### **Why can't I limit all sharing?**

Federal law gives you the right to limit only (i) sharing for affiliates' everyday business purposes – information about your creditworthiness; (ii) affiliates from using your information to market to you; and (iii) sharing for non-affiliates to market to you. State laws may give you additional rights to limit sharing.

### **Can I see my personal information and/or ask to have it deleted?**

Yes. If you are a California resident you have the right to request to see your personal information relating to the 12-month period preceding our request, or ask that your personal information be deleted, subject to certain exceptions under the CCPA. If you wish to file a request, please contact us at (855) 587-7715 or email us at [CaliforniaPrivacy@trupanion.com](mailto:CaliforniaPrivacy@trupanion.com). Please be advised that we will only process this request if we can verify the identity of the requestor. Only you or a person legally authorized to act on your behalf may make a request related to your personal information. Please include your name, address, telephone number, and policy number (if applicable), and let us know what kind of information you would like to have removed. A verifiable request does not require you to have a policy with us. We will only use personal information provided in the request to verify the requestor's identify and/or authority to make the request.

### **Changes to our Privacy Notice**

We reserve the right to amend this Privacy Notice at our discretion and at any time. The date this Privacy Notice was last updated is identified at the bottom of this page. You are responsible for periodically visiting the Trupanion website and this Privacy Notice to check for any changes. This policy is reviewed annually.

### **Questions**

Please contact us at (855) 587-7715 or [CaliforniaPrivacy@trupanion.com](mailto:CaliforniaPrivacy@trupanion.com) if you have any questions about this Notice.

*Updated: March 1, 2022*