

## Privacy Policy

### Personal Lines & Commercial Lines Web Applications

Effective date: April 28, 2023

At CAPE Analytics, we take your privacy seriously. Please read this Personal and Commercial Lines Web Applications Privacy Policy to learn how we treat your personal data that is collected in connection with providing our Services. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of CAPE Analytics' Services is at all times subject to our Terms of Use, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by clicking here.

As we continually work to improve our Services, we may need to change this Privacy Policy from time to time. Upon such changes, we will alert you to any such changes by placing a notice on the CAPE Analytics website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

### Privacy Policy Table of Contents

#### What this Privacy Policy Covers

##### Personal Data

- *Categories of Personal Data We Collect*
- *Categories of Sources of Personal Data*
- *Our Commercial or Business Purposes for Collecting or Disclosing Personal Data*

##### How We Share Your Personal Data

##### Tracking Tools and Opt-Out

##### Data Security

##### Data Retention

##### Personal Data of Children

##### Certain State Law Privacy Rights

##### Contact Information

### What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations. It also includes information we receive from third parties

that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device. It does not include deidentified or aggregated consumer information. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.

**Personal Data**

*Categories of Personal Data We Collect*

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

<b><u>Category of Personal Data</u></b>	<b><u>Examples of Personal Data We May Collect</u></b>	<b><u>Categories of Third Parties With Whom We May Share this Personal Data:</u></b>
<b>Profile or Contact Data</b>	<ul style="list-style-type: none"> <li>● First and last name</li> <li>● Email</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Analytics Partners</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Commercial Information (regarding real estate)</b>	<ul style="list-style-type: none"> <li>● Includes property owner name, contact information and address</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> </ul>
<b>Online Identifiers</b>	<ul style="list-style-type: none"> <li>● Unique identifiers such as account name and passwords</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Parties You Authorize, Access or Authenticate</li> </ul>
<b>Categories of Data Considered “Sensitive” Under the California Privacy Rights Act</b>	<ul style="list-style-type: none"> <li>● A person’s account log-in and password</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> </ul>
<b>Device/IP Data</b>	<ul style="list-style-type: none"> <li>● IP address</li> </ul>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Analytics Partners</li> </ul>

*Categories of Sources of Personal Data*

We collect Personal Data about you from the following categories of sources:

- **You**
  - When you provide such information directly to us.
    - When you create an account or use our interactive tools and Services.
    - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
    - When you send us an email or otherwise contact us.
  - When you use the Services and such information is collected automatically.
    - Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
    - If you use a location-enabled browser, we may receive information about your location.

- If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
- **Public Records**
  - From the government or other public sources, such as the NMLS.
- **Third Parties**
  - Vendors
    - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.

*Our Commercial or Business Purposes for Collecting or Disclosing Personal Data*

- **Providing, Customizing and Improving the Services**
  - Creating and managing your account or other user profiles.
  - Providing you with the products, services or information you request.
  - Meeting or fulfilling the reason you provided the information to us.
  - Providing support and assistance for the Services.
  - Improving the Services, including testing, research, internal analytics and product development.
  - Personalizing the Services and communications based on your preferences.
  - Doing fraud protection, security and debugging.
  - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (the “CCPA”).
- **Marketing the Services**
  - Marketing and selling the Services.
- **Corresponding with You**
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about CAPE Analytics or the Services.
  - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
  - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
  - Protecting the rights, property or safety of you, CAPE Analytics or another party.
  - Enforcing any agreements with you.
  - Responding to claims that any posting or other content violates third-party rights.
  - Resolving disputes.

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

**How We Share Your Personal Data**

We disclose your Personal Data to the categories of service providers and other parties listed in this section.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Security and fraud prevention consultants.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
  - Companies that track how users found or were referred to the Services.
  - Companies that track how users interact with the Services.
- **Parties You Authorize, Access or Authenticate**
  - Third parties you access through the services.

### Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

### Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Where legally required we will give you prior notice and, if you have a legal right to do so, an opportunity to object to this transfer.

### Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

### Tracking Tools and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

### **Data Security**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

### **Data Retention**

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

For example:

- We retain your submitted information until you opt out of communications from CAPE.
- We retain your profile information and credentials if you open an account with us for as long as you have an account with us.

- We retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.

### **Personal Data of Children**

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 13 years of age; if you are a child under the age of 13, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will delete that information as quickly as possible. If you believe that a child under 13 years of age may have provided Personal Data to us, please contact us at [privacy@capeanalytics.com](mailto:privacy@capeanalytics.com).

### **Certain State Law Privacy Rights:**

#### *California Resident Rights*

If you are a California resident, you have the rights set forth in our California Resident Privacy Notice.

#### *Virginia Resident Rights*

If you are a Virginia resident, you have the rights set forth in our Virginia Resident Privacy Notice.

#### *Nevada Resident Rights*

If you are a Nevada resident, you have the rights set forth in our Nevada Resident Privacy Notice.

### **Contact Information:**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- [www.capeanalytics.com](http://www.capeanalytics.com)
- [privacy@capeanalytics.com](mailto:privacy@capeanalytics.com)
- 411 High Street, Palo Alto, CA 94301