PRIVACY POLICY

Last modified: August 31, 2022

WE RESPECT YOUR PRIVACY. We at PBR Marketing, LLC DBA Bhalu Insurance Services ("**BIS**", "**we**," "**us**," or "**our**") respect your privacy and are committed to protecting your information to the extent possible through this privacy policy (this "**policy**") and in accordance with applicable law.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.bhaluinsurance.com (the "Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect: (1) on the Website; (2) in email, text, and other electronic messages between you and the Website; and (3) when you interact with our advertising on third-party websites, if such advertising links to this Policy.

This policy does not apply to information collected by: (1) us offline or through any other means, including on any other website operated by the Company or any third party (including our affiliates and subsidiaries); or (2) any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with this policy, your choice is to not use the Website. By accessing or using the Website, you agree to this policy. This policy may change from time to time (see <u>Changes to Our Privacy Policy</u>). Your continued use of the Website after we make changes is deemed to be acceptance of those changes, so please check this policy periodically for updates.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT. We collect several types of information from and about users of the Website, including information: (1) by which you may be personally identified, such as name, postal address, e-mail address, telephone number, payment information, driver's license number, date of birth, or social security number ("**personal information**"); (2) that is about you but individually does not identify you, such as household income range, gender, product and service preferences; and (3) about your internet connection, the equipment you use to access the Website, and usage details.

We collect this information directly from you when you provide it to us, automatically as you navigate through the site (information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies), and from third parties, for example, our business partners. Our business partners collect certain information about you for the purposes of providing, maintaining, or improving our products and services, we may use this information to confirm your identity, contact you, provide customer support (or other platforms where you may reach us), operate your account with us, and invoice you.

Information You Provide to Us

The information we collect on or through the Website may include:

- Information that you provide by filling in forms on the Website. This includes information
 provided at the time of registering to use the Website, subscribing to our service, signing
 up to receive our newsletter, posting material, or requesting additional services. We may
 also ask you for information when you enter a contest or promotion sponsored by us, and
 when you report a problem with the Website.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through the Website (such as quote request information) and of the fulfillment of your purchases. You may be required to provide financial information before purchasing a product or service through the Website.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk, and no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website who access your User Contributions. Therefore, we cannot and do not guarantee who will view your User Contributions.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with the Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including details of your visits to the Website (such as traffic data, location data, logs, and other communication data and the resources that you access and use on the Website), and information about your computer and internet connection, including your IP address, operating system, browser type, and language.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). See <u>Cookies (or browser cookies) and other technologies</u> for information on how you can opt out of behavioral tracking on the Website and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically may be maintained or associated with personal information we collect in other ways or receive from third parties. It helps us to improve the Website and to deliver a better and more personalized service, including by enabling us to: (1) estimate our audience size and usage patterns; (2) store information about your preferences, allowing us to customize the Website according to your individual interests; (3) speed up your searches; and (4) recognize you when you return to the Website.

The technologies we use for this automatic data collection may include:

Cookies (or browser cookies) and other technologies. A cookie is a small file placed on the hard drive of your computer or mobile device so that your computer will "remember" information about your visit. Pixel tags (also called web beacons or clear gifs) are small

strings of code that monitor your use of the Website and certain emails to provide information about your visit to the Website or response to our emails. We use these technologies to collect information, enhance your experience using the Website and receiving our emails, and to help us provide, maintain, improve and protect the Website.

Certain browsers have incorporated Do Not Track ("**DNT**") preferences. When turned on, these features generally send signals to the website you are visiting that you do not wish to have information about your online searching and browsing activities collected and used. Currently, we do not respond to DNT signals.

If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Website. Please consult your internet browser's documentation for more information on how to refuse cookies and how to delete persistent cookies. Please note that if you decide not to accept cookies from us, the Website may not function properly. Additionally, controlling cookies may not limit the use of other technologies.

- Third-Party Analytics. We use third-party analytics services (e.g., Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Website and mobile and internet usage. These third parties use cookies and other technologies to help analyze and provide us data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this policy. For more information on Google Analytics, including how to opt out from certain data collection, please visit https://www.google.com/analytics. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Website. If you wish, you may Disable Google Analytics while on the Website.
- Other Third Parties. We also may collect or receive information from third parties, such as Facebook and other third-party social media sites.

THIRD-PARTY USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES. Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies, pixel tags, or other tracking technologies to collect information about you when you use the Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see <u>Choices About How We Use and Disclose Your Information</u>.

HOW WE USE YOUR INFORMATION. We use information that you provide to us or that we collect about you, including any personal information:

- To maintain and improve the Website, its contents, and our services to you.
- To provide you with information, products, or services that you request from us and our third-party marketing partners.
- To provide customer support and ensure security of your account.
- To administer our rewards and promotional programs.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to the Website or any products or services we offer or provide through it.
- To solicit your feedback and allow you to participate in interactive features on the Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-party goods and services that may be of interest to you. You can also opt-out by sending us an email with your request to info@bhaluinsurance.com. For more information, see Choices About How We Use and Disclose Your Information.

DISCLOSURE OF YOUR INFORMATION. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. We may disclose personal information that we collect or that you provide as described in this privacy policy:

- To our parent company, subsidiaries, joint ventures, affiliates, or other companies under common control with us.
- To contractors, service providers, and other third parties we use to support our business (such as to provide you with information, products, services, or customer support on our behalf).
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about users of the Website is among the assets transferred.

- To third parties to market their products or services to you if you have not opted out of these disclosures. For more information, see Choices About How We Use and Disclose Your Information.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent. We use standard OAuth (open authorization) to: (1) enable you to give permission to share your Personal Information with other websites and services, such as Facebook and Twitter (e.g., when you agree to a pop-up requesting you to allow another application to access your account information); and (2) allow us to share information about you that is stored by us without sharing your security credentials.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our <u>Terms of Use</u>, <u>Terms of Sale</u>, and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

The categories of personal information we may disclose include your name, postal address, email address, telephone number, payment information, driver's license number, date of birth, or social security number.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION. We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- Disclosure of Your Information for Third-Party Advertising. If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email with your request to info@bhaluinsurance.com.
- Promotional Offers from the Company. If you do not wish to have your contact information used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to info@bhaluinsurance.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out mechanism

does not apply to information provided to the Company as a result of a product purchase or other transactions.

Targeted Advertising. If you do not want us to use information that we collect or that you
provide to us to deliver advertisements according to our advertisers' target-audience
preferences, you can opt-out by sending us an email stating your request to
info@bhaluinsurance.com.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Residents of certain states, such as California, Nevada, Colorado, Virginia, and Utah may have additional personal information rights and choices. Please see <u>Your State Privacy Rights</u> for more information.

ACCESSING AND CORRECTING YOUR INFORMATION. You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at info@bhaluinsurance.com to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change or delete information if we believe the change or deletion would violate any law or legal requirement, cause the information to be incorrect, or if the information needs to be maintained without modification for administrative or security purposes.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other users of the Website. Proper access and use of information provided on the Website, including User Contributions, is governed by our Terms of Use.

Residents of certain states, such as California, Nevada, Colorado, Virginia, and Utah may have additional personal information rights and choices. Please see <u>Your State Privacy Rights</u> for more information.

YOUR STATE PRIVACY RIGHTS. State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

 Correct inaccuracies in their personal information, taking into account the information's nature processing purpose. Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights or appeal a decision regarding a consumer rights request, please send us an email stating your request to info@bhaluinsurance.com.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out right may submit a request to us at info@bhaluinsurance.com. However, please know we do not currently sell data triggering that statute's opt-out requirements.

THE WEBSITE IS NOT DIRECTED TO CHILDREN. The Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16.

If you are under 16, do not use or provide any information on the Website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive features of the Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce this policy by instructing their children to only provide information over the internet with their permission.

If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at info@bhaluinsurance.com.

DATA SECURITY. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, disclosure, and destruction. Please understand, however, that no security system is impenetrable and the transmission of information via the internet is not completely secure.

Although we do our best to protect your personal information, we cannot guarantee the security of our databases, or any information transmitted over the internet. Any transmission of personal information is at your own risk. In particular, e-mail sent to or from the Website may not be secure, and you should therefore take special care in deciding what information you send to us via email.

We are not responsible for circumvention of any privacy settings or security measures contained on the Website. If you have reason to believe that your interaction with us is no longer secure (e.g., you feel that the security of your account has been compromised), please contact us at info@bhaluinsurance.com immediately.

Additionally, the safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website. The information you share in public areas may be viewed by any user of the Website.

CHANGES TO OUR PRIVACY POLICY. It is our policy to post any changes we make to our privacy policy on this page (the date the privacy policy was last revised is identified at the top of the page). If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account or through a notice on the Website home page. You are responsible for ensuring we have an active and deliverable email address for you, and for periodically visiting the Website and this privacy policy to check for any changes.

CONTACT INFORMATION. To ask questions or comment about this privacy policy and our privacy practices, contact us at: info@bhaluinsurance.com.