

## **St. Johns Insurance Company, Inc.**

### **PRIVACY POLICY**

Effective Date: March 21, 2019.

Welcome! You have arrived at <https://www.stjohnsinsurance.com>, which is owned and operated by St. Johns Insurance Company (“St. Johns Insurance” or “we,” “our” or “us”).

St. Johns Insurance Company respects your privacy. This Privacy Policy describes our privacy policies and procedures in safeguarding information about customers that obtain financial products or services for personal, family, or household purposes. This Privacy Policy governs your use of any online services and also applies to your use of any widgets, plug-ins, applications, content, downloads and/or other services that we own, control and make available through this site (collectively, the “Service”). This Privacy Policy does not apply to our data collection activities offline or otherwise outside of our Service (unless otherwise stated below), and does not govern the data practices of third parties that may interact with our Service. To the extent we provide you notice on our Service of different or additional privacy policies or practices (*e.g.*, at the point of our collection), those additional terms shall govern such data collection and use.

#### **INFORMATION WE COLLECT**

St. Johns Insurance may collect information you provide directly to St. Johns Insurance, its service providers, and/or associated third party services. For example, St. Johns Insurance may collect personal information when you communicate or transact with St. Johns Insurance through the Service.

St. Johns Insurance, its service providers, and/or associated third-party services may collect information, including: (1) personally identifiable information, which is information that identifies you personally, such as your first and last name, e-mail address, phone number, address, insurance policy types and number, Social Security number, and full payment account number (“Personal Information”); and (2) demographic information, such as your gender, age, and zip code (“Demographic Information”). Except to the extent required by applicable law, Demographic Information is considered “non-Personal Information.” In addition, as permitted by applicable law, Personal Information, including, without limitation, St. Johns Insurance-Collected PI (defined below), once “De-identified” (*i.e.*, the removal or modification of personally identifiable elements or the extraction of non-personally identifiable elements) is also non-Personal Information and may be used and shared without obligation to you. To the extent any non-Personal Information is combined by or on behalf of St. Johns Insurance with Personal Information, St. Johns Insurance itself collects directly from you (“St. Johns Insurance-Collected PI”), St. Johns Insurance will treat the combined data as St. Johns Insurance-Collected PI under this Privacy Policy.

#### **HOW WE USE THE INFORMATION WE OBTAIN**

St. Johns Insurance may use information about you, including St. Johns Insurance-Collected PI and other Personal Information, for any purposes not inconsistent with this Privacy Policy, or our statements at the point of collection, and not prohibited by applicable law, including, without limitation, the following: (1) to provide you with information or services or process transactions that you have requested or agreed to receive, including to send you electronic newsletters, or to provide you with special offers or promotional materials on behalf of us or third parties; (2) to enable you to participate in a variety of the Service’s features including online entry sweepstakes, contests or other promotions; (3) to process your registration with any of the Service, including verifying your information is active and valid and

managing your account; (4) to manage and administer the Service including account management, and billing and collections activities; (5) to improve the Service or create new service offerings, to customize your experience on any of the Service, or to serve you, or suggest to you, specific content that may be most relevant to you; (6) to contact you with regard to your use of any of the Service and, in our discretion, changes to the any of the Service and/or any of the Service's policies; (7) to prevent unauthorized, improper or illegal activities on the Service; (8) for internal business purposes; and (9) for purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy or for any other legal purpose not inconsistent with this Privacy Policy.

### **INFORMATION WE SHARE WITH THIRD PARTIES**

St. Johns Insurance may share non-Personal Information, and Personal Information that is not deemed St. Johns Insurance-Collected PI hereunder, with St. Johns Insurance affiliates or third-party service providers for any purpose.

St. Johns Insurance may also share any information about you for any purposes not in-consistent with this Privacy Policy, or our statements as the point of collection, and not prohibited by applicable law, including, without limitation:

- *Service Providers.* St. Johns Insurance's agents, vendors, consultants, and other service providers (collectively "Service Providers") may receive, or be given access to your information, including, without limitation, Personal Information, Demographic Information, and usage information, in connection with their work on St. Johns Insurance's behalf. St. Johns Insurance does not authorize its Service Providers to use St. Johns Insurance-Collected PI provided by St. Johns Insurance to the Service Providers to send you direct marketing messages other than related to the St. Johns Insurance absent your consent. However, associated third-party services, may set and access their own tracking technologies on your device, and they may otherwise collect or have access to information about you, potentially including Personal Information, about you. We are not responsible for those third-party technologies or activities arising out of them or any information they collect directly from you. Some may offer you certain choices regarding their practices.
- *Corporate Transactions.* In addition, St. Johns Insurance may share your St. Johns Insurance-Collected Personal Information (as well as your other Personal Information and your non-Personal Information), in connection with or during negotiations of any proposed or actual insurance transaction or claim.

#### To Protect St. Johns Insurance and Others

To the fullest extent not prohibited by applicable law, we may also disclose your information if we believe in good faith that doing so is necessary or appropriate to: (i) protect or defend the rights, safety or property of St. Johns Insurance or third parties; (ii) comply with legal and regulatory obligations and government requests (*e.g.*, pursuant to law enforcement inquiries, subpoenas or court orders); (iii) comply with our obligations and commitments to safeguard the privacy and security of your information; or (iv) prevent unauthorized, improper or illegal activities on the Service.

If you notify us that you believe your rights have been violated in connection with the Service or another user of the Service, we may disclose information about you to the extent necessary to evaluate and respond to your concern. To the fullest extent not prohibited by applicable law, we have complete discretion in electing to make or not make such disclosures, and to contest or not contest requests for such disclosures, all without notice to you.

## **WHAT ARE YOUR OPTIONS.**

Upon request, you can review any personal information we collect about you. If you have any questions or concerns about the information presented in this Privacy Policy, or would like to make a request for personal information access, you may contact: *St. Johns Insurance Company, P.O. Box 1779, Columbia, SC 29202-1779*. You may recommend changes to your personal information by submitting a written request that credibly shows the error. Additionally, if you choose, you may have any personal information collected about you discarded without reuse or distribution, provided we are contacted in a timely fashion, typically within 30 days from the date you provide the information to us. If you believe that your personal information is being used for a purpose other than what was intended when submitted, you may contact us. In all cases, we will take reasonable steps to verify your identity before granting access or making corrections.

## **WHEN YOU PROVIDE INFORMATION TO THIRD PARTIES.**

You may be presented with an option to receive certain information and/or marketing offers directly from third parties, or to have us send certain information to third parties. If you choose to do so, your Personal Information, including St. Johns Insurance-Collected PI, may be disclosed to such third parties and all information disclosed will be subject to the privacy policies and practices of such third parties. We are not responsible for the privacy policies and practices of any third parties, even though the St. Johns Insurance name and logo may appear on those sites. We encourage you to review any third-party privacy policies and practices prior to requesting information from or otherwise interacting with them.

### Co-Branded Areas

Certain areas of the Service may be provided to you in association with third parties (“Co-Branded Areas”). When you link to another site, you are no longer on our site and are subject to the privacy policy of the new site. While St. Johns Insurance strives to provide high-quality information and services to our users, St. Johns Insurance does not guarantee the quality or accuracy of content provided by linked websites.

If you elect to register for products and/or services, communicate with these third parties, or download their content or applications, you may be providing your information to both us and the third-party. Further, if you sign-in to a Co-Branded Area with a username and password obtained on the Service, your Personal Information may be disclosed to that third party. We are not responsible for such third party’s data collection or practices and you should look to such third-party privacy policies for more information.

## **CHILDREN’S PRIVACY**

We understand the importance of protecting children’s privacy in the interactive world. We are a general audience service and do not use the Service to knowingly collect personal information from children under the age of thirteen (13) that requires parental notice and consent under the Children’s Online Privacy Protection Act (“COPPA”) without such parental consent. If you are a child under thirteen (13) years of age, you are not permitted to use the Service and should not send any information about yourself to us through the Service. In the event that we become aware that we have collected personal information from any child, we will dispose of that information, or otherwise treat it, in accordance with COPPA and other applicable laws and regulations.

## **DATA SECURITY AND MONITORING**

St. Johns Insurance has taken several steps to safeguard the integrity of its telecommunications and computing infrastructure, including but not limited to authentication, monitoring, auditing, and

encryption. Security measures have been integrated into the design, implementation and day-to-day practices of the entire Company's operating environment as part of its continuing commitment to risk management. This information is not legal, business, or other advice, and does not warrant that information security measures provided via St. Johns Insurance's website are absolutely secure under all circumstances.

#### **UPDATES TO OUR PRIVACY POLICY**

We reserve the right to change this Privacy Policy prospectively effective upon the posting of the revised Privacy Policy and your use of our Service indicates your consent to the privacy policy posted at the time of use. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.