

ONLINE PRIVACY NOTICE

Last updated on May 1, 2020

Scope of this Privacy Notice

This online Privacy Notice (“Notice”) applies to the NAIT website and any other website that links to this Notice (collectively, “Website”). This Notice also applies to and describes our practices on how we collect, use, disclose, and store information from you through the Website or other means, including by e-mail or phone. This Notice describes (i) the types of information that we collect from you; (ii) how we use the information we collect; (iii) how we may share the information we collect with third parties; (iv) the security we employ to protect the information we collect; and (v) how you may contact us and opt out of certain uses or sharing of your information.

The terms “we”, “us”, or “our” in this Notice refer to NAIT USA and any affiliate or subsidiary.

Please review this Notice carefully. By accessing and using this Website, you signal your consent to the terms of Notice. When you submit information to us, whether online or offline, you consent to the terms of this Notice. If you do not agree with any part of this Notice, please do not provide any information to us.

We also urge that you review our Terms of Use, posted [here](#). The Terms of Use describes the terms and conditions for use of the Website, discusses the content in the Website, and information about your responsibilities when using the Website. If you access or use this Website, you also accept and agree to be bound by our Terms of Use.

International Users’ Privacy

The Website is controlled and operated by IAT Insurance Group from offices within the United States of America. The Website is operated and intended for the use of persons residing in the United States only. NAIT, and its affiliates and subsidiaries, do not seek or knowingly collect personal information from persons residing outside the United States. The Website, or any services in connection with the Website, are not for use in any jurisdiction outside the United States. If you do not reside within the United States, you are not authorized to access or use the Website.

Children’s Privacy

NAIT, as well as any affiliate or subsidiary, do not seek, or knowingly collect, personal information from children under the age of thirteen (13). We request that children under the age of thirteen do not provide any information to us.

Modification Without Notice

We may change the terms of this Notice at any time and from time to time. Any such modification shall be effective immediately upon posting and without notice. Your continued access and use of our Website, or your providing any information to us following the posting of a revised Notice shall signal your acceptance of the revised Notice. If you do not agree with the revised Notice, do not access or use this Website, or provide us with any information.

Consumer Privacy Notice

If you engage in business with us whereby we deliver financial services or products to you, we provide special information on our use of the information we collect, use, and share in the section at the end of this Notice titled “*Consumer Privacy Notice for Financial Services.*” Please refer to that section for information on our privacy practices for delivering financial products or services.

Information We Collect

We may collect certain personal information about you when you provide it to us while using the Website, or communicate with us by phone, email, or other means. We also may collect information from third parties, such as insurance agents and brokers, in connection with our products or services you purchase, or inquire about



purchasing, from us, including without limitation when you fill out application forms or seek to report a claim under an insurance policy. Such information may include your name, home address or work address (or both), gender, telephone and facsimile number(s), and email address. Other information that we may collect includes driver's license number, social security number, tax identification number, bank account or credit card information, motor vehicle history, personal health information, and claims history. When using the Website, we also can collect your IP address, browser type, domain names, access times, and other websites you have visited via the use of cookies (discussed below).

How We May Use This Information

We may use the information we collect about you for a variety of purposes, including to provide you with, renew, or modify our products and services; to provide you with information that you request, or for other customer service related reasons; to process claims reported by you or others; to provide you with information about our products and services; to improve the quality of products or services we provide you, including your experience in navigating the Website; to comply with applicable law; to detect or prevent fraud, infringement, or other potential misuse of the Website, or our products and services. We may anonymize, aggregate or combine information we collect online or elsewhere for the above purposes or other purposes, and/or to analyze statistics on usage and trends.

We May Share Your Personal Information

We also may share your personal information. We may share your information with affiliates for the purpose of offering you products or services that you may have interest in, and/or to effect transactions, products, or services that you authorize or request. We also may share your information with our contractors or service providers to the extent necessary to allow them to assist our business in providing our products or services, and/or to perform marketing services on our behalf, including to entities with whom we have joint marketing agreements. We may share your information with non-affiliated companies. Non-affiliated companies with whom we may share your information are not permitted to use your information other than to promote their products and services to you. We may share your information, if necessary, in connection with a merger, consolidation, acquisition, divestiture or other corporate restructuring of all or part of our business. We may share your information for legal purposes, such as to protect and enforce our rights, to protect the rights, property, and safety of others, or if otherwise required or permitted by law.

Cookies

NAIT uses cookies on the Website to improve the Website's functionality and to track information about how visitors use the Website. This allows us to better improve users' experience on the Website and to personalize the Website to users' preferences. Cookies allow us to identify you as a particular user, and thus provide you with a more customized service or experience. We may use cookies to track user requests, inquiries, and traffic patterns, or to determine audience size and repeated usage. We also collect information about your activities while you are at our Website. We may log IP addresses, browser and platform types, domain names, access times, referral data (the last website or URL you visited before logging into our website and the first website or URL you visit after leaving our website), and your activity while using or reviewing our website.

You may opt out of accepting cookies by changing the settings on your browser. However, by rejecting cookies, you may prevent your use of certain functions, and you may have to repeatedly enter information in the Website in order to take advantage of services or promotions. Please note that cookies can only read the identification number created by the random generator on your computer and can only retrieve information that is directly related to the Website.

You can review our cookie policy [here](#).

Security

We employ reasonable administrative, technical, and physical safeguards designed to protect personal information. We only allow information to be submitted for transmission if your browser is compatible with our security software. If your browser is not compatible, you will receive a message indicating your transaction cannot be completed because of a security risk.



NAIT uses a secure server, security protocols, and security ciphers to safeguard the information you provide by encrypting it using secure transport layer security (TLS). Please note that email messages ARE NOT SECURE. Our security software does not encrypt email messages. Unencrypted email messages traveling through the Internet are potentially subject to viewing, alteration and copying by others.

To configure TLS compliance which requires email to be transmitted via a secure connection or if you believe that the security of any account you might have with us has been compromised, please email

security@naitusa.com.

Passwords

In order to access certain information on our Website and to protect personal information from being accessed by others, you may be asked to create a password-protected account. You are responsible for maintaining the confidentiality of your username and password. NAIT shall not be liable for any loss that you may incur as a result of someone else using your username and password. You may not share your password. Please see the Terms of Use – under Username and Password – for requirements and prohibitions regarding your password.

ACH Transaction, Credit and Debit Card Safety

If you pay an invoice or bill, or make a purchase, on the Website, you will be routed to our bank services link for processing of your ACH, Credit or Debit Card transaction. Your checking account, credit or debit card number is encrypted when transmitted. Encryption is used with every submission of financial information you send. Other personal information may also be encrypted when authorizing a payment.

Linked Websites

For your convenience, the Website may contain links to other websites (“Linked Websites”). Linked Websites are not under the control of NAIT and NAIT is not and cannot be responsible for the privacy practices of any websites not under our control, and we do not endorse any of those websites, the services or products described or offered on such websites, or any of the content contained on those websites. Before providing any personal information to such websites, please be sure to carefully review the website’s privacy notice.

How to Contact Us or Opt Out

If you have a question or would like to access and correct your personal information that you submitted to us, please address requests to the address below. If you prefer that we do not share personal information about you with our affiliates for marketing purposes, or to nonaffiliated third parties, except as otherwise permitted or required by law, you may direct us not to do so by contacting us in the manners provided below. If you prefer that we do not direct market to you via our affiliates and nonaffiliated third parties through e-mail, postal mail, and/or telemarketing, you may direct us not to do so by contacting us in the manners provided below, or by sending a request by mail to the address above.

- Postal Mail

702 Oberlin Road
Box 10800
Raleigh, NC 27605

- Telephone: 1 (919) 573-1690



- Email Privacy: privacy@naitusa.com
- Email Security: security@naitusa.com

Your Rights: California and Nevada Residents

Depending on where you live, you may have certain rights with respect to your information that we collect. Please note that you may be located in a jurisdiction where we are not obligated, or are unable, to fulfill a request. In such a case, your request may not be fulfilled.

Rights of California Residents. California residents with rights under the California Consumer Privacy Act (“CCPA”), or their authorized agents, may click [here](#) to learn those rights and make for access or deletion requests, or they may call 1 (919) 573-1690 or email privacy@naitusa.com.

Do Not Sell My Personal Information. California residents may opt out of the “sale” of their personal information. Please call 1 (919) 573-1690 or email privacy@naitusa.com to opt out of the “sale” of your personal information.

Rights of Nevada Residents.

IAT does not engage in the following activity, however Nevada law requires us to post the following: certain Nevada consumers may opt out of the sale of “covered information” for monetary consideration to a person for that person to license or sell such information. “Covered information” includes first and last name, address, email address, phone number, Social Security Number, or an identifier that allows a specific person to be contacted either physically or online.

You may submit a request to opt out of any potential future sales under Nevada law by emailing us at privacy@naitusa.com. Please use “Nevada Do Not Sell” in the subject line. Note we will take reasonable steps to verify your identity and the authenticity of the request. Once verified, we will maintain your request in the event our practices change.

Consumer Privacy Notice

If you engage in business with us whereby we deliver financial services or products to you, this section discloses our sharing of the information we collect and use. Financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons NAIT chooses to share; and whether you can limit this sharing.

Sharing of Personal Information

Reasons we can share your personal information.	Do we share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), coordinate insurance coverage with your broker, qualify you for coverage, process claims, identify or prevent fraud, respond to court orders and legal investigations, or insurance support	YES	NO
For our marketing purposes – to offer our products and services to you	YES	NO
For joint marketing with our financial companies	YES	NO
For our affiliates’ everyday business purposes – information about your transactions and experiences	YES	NO
For our affiliates’ everyday business purposes – information about your creditworthiness	YES	NO
For our affiliates to market to you	YES	NO
For our non-affiliates to market to you	YES	YES

Limit our Sharing

Federal law gives you the right to limit only:

- Sharing for affiliates’ everyday business purposes – information about your credit worthiness
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

Additional laws and individual companies may give you additional rights to limit sharing. You may opt out of such sharing by contacting us, as explained in the “*How to Contact Us and Opt Out*” section above.

Privacy Policy for California Residents

This Privacy Policy is for California Residents (the “California Policy”) and supplements the information contained in our main Notice. This California Policy explains the personal information we collect or process about California residents in connection with our Website, as well as products and services (collectively, “Services”) we may offer, how we use,



and share that personal information, and what your rights are with respect to your personal information that we gather and process.

This California Policy only applies to California residents, and we adopt it to comply with the California Consumer Privacy Act of 2018 (CCPA) and other California privacy laws. Any terms defined in CCPA have the same meaning when used in this policy, including the term “personal information,” which means “information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” Personal information does not include information that has been de-identified or aggregated.

Personal Information We Collect and Share, and For What Purpose

In the past 12 months, we may have collected and shared the following [categories of personal information](#) from or about California residents in connection with our Services.

Personal Information We Collect and Have Sold – Do Not Sell My Personal Information

California residents may opt out of the “sale” of their personal information.

We do not sell personal data for money. However, California law broadly defines “sale” in a way that may include in its definition certain exchanges of information beyond the traditional sense of exchanging data for money. This could include allowing third parties to receive certain information from us about you, such as cookies, an IP address, and/or browsing behavior, to add to a profile about your device, browser, or you.

We share the following categories of information gathered in connection with our Services for advertising which may be considered a sale (as defined by California law):

- *WHAT DOES IAT SHARE, WHAT DO THE CONTRACTS SAY?*

If you would like to opt out of IAT’s use of your information for such purposes (to the extent this is considered a sale), you may do so as outlined on the following page: [Do Not Sell My Personal Information](#).

Your Rights as a California Resident

Under the CCPA, California residents have specific rights regarding their personal information as described below. You may make these requests on your behalf or through a designated, authorized agent. These rights are subject to certain exceptions. We explain how you may exercise this right in the section “*How To Exercise Your Rights Under the CCPA*” further below.

1. *The Right to Know.* You have the right to request that we disclose certain information regarding our practices with respect to personal information. If you submit a valid and verifiable request and we confirm your identity and/or authority to make the request, we will disclose to you any of the following at your direction: (i) The categories of personal information we have collected about you in the last 12 months, (ii) The categories of sources for the personal information we have collected about you in the last 12 months, (iii) Our business or commercial purpose for collecting that personal information, (iv) The categories of third parties with whom we share that personal information, and (v) The specific pieces of personal information we collected about you. In addition, if we sold your personal information or disclosed it to a third party for a business purpose, we will provide a list of the personal information types that each category of recipient. We explain how you may exercise this right to disclosure further below.

2. *Right to Deletion.* You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. If you submit a valid and verifiable request, and we can confirm your identity and/or authority to make the request, we will determine if retaining the information is necessary for us or our service providers to:

- Complete a transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with a legal obligation; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If none of the above retention conditions apply, we will delete your personal information from our records and direct our service providers to do the same. We explain how you may exercise this right further below. Please note that deletion of your information may affect your experience when accessing or using our Services, including the ability to use our Services.

3. *Right to Opt-Out of the Sale of Your Personal Information.* As a California resident, you have the right to direct a business that sells your personal information to third parties not to sell your personal information. This right is referred to as “the right to opt-out.” We explain how you may exercise this right further below.

4. *Right Against Discrimination.* You may exercise your rights under the CCPA without discrimination. For example, unless the CCPA provides an exception, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;



- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may offer you financial incentives to provide us with personal information that is reasonably related to the information's value. This could result in different prices, rates, or quality levels for our products or services. Any financial incentive we offer will be described in written terms that explain the material aspects of the financial incentive program. You must opt-in to any financial incentive program and may revoke your consent at any time by contacting us as indicated below.

How to Exercise Your Rights Under the CCPA

To submit general questions or requests regarding this Privacy Notice or our privacy practices, please contact us at privacy@iatinsurance.com.

Requests to Know or Delete. To submit a verifiable request under the CCPA to know what personal information is collected, disclosed or sold, or to delete your personal information, please email privacy@naitusa.com.

Alternatively, you may call us at this number: 1 (919) 573-1690. Please note that you if you choose to make a CCPA request by telephone, we will require certain information in order to verify who you are, including your name, account information, address, telephone number....

We will endeavor to respond to your request within 45 days. If we need additional time, we will inform you within that time period. Your request will be processed free of charge, but no more than twice every 12 months.

Requests to Opt-Out. To submit a request under the CCPA to opt-out of the sale of your personal information, please email privacy@naitusa.com.

Alternatively, you may call us at this number: 1 (919) 573-1690. Please note that you if you choose to make a CCPA request by telephone, we will require certain information in order to verify who you are, including your name, account information, address, telephone number....

Requests to Opt-In. If you previously have opted-out of the sale of your personal information, but wish to opt-in, you may email privacy@naitusa.com.

Direct Marketing Lists – California Shine the Light Law

California residents can also request a list of all the third parties to which we have disclosed certain personal information (as defined by California's Shine the Light law) during the preceding year for those third parties' direct marketing purposes. California residents may contact us at privacy@iatinsurance.com.

In the body of your request, you must include: "California Shine the Light Request", your name, a current California address including, street address, city, state, and zip code, as well as sufficient information for us to determine if the law applies to you. You will need to attest to the fact that you are a California resident. We will not accept requests by telephone, email, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.