



CALIFORNIA PRIVACY POLICY

IN ADDITION TO OUR GENERAL PRIVACY POLICY STATEMENT POSTED [HERE](#), WHICH APPLIES TO ALL CONSUMERS, THIS POLICY PERTAINS TO CALIFORNIA CONSUMERS ONLY.

This notice is prepared pursuant to California Consumer Privacy Act of 2018 (“CCPA” or “the Act”) which gives California residents (“Consumer” or “you” or “your”) the right to know what categories of Personal Information (“PI”) Tristar Insurance Group, Inc., its subsidiaries and affiliates (collectively “TRISTAR” or “the Company” or “we” or “us”) collects about you, and how and for what purposes the PI is used. While TRISTAR does not sell your PI, it does collect, use, and share PI for the purpose of administering your claims or offering you employment opportunities. This notice outlines and explains how you may exercise your rights to request that we: (1) provide certain PI that we have collected about you during the past 12 months, or (2) delete certain PI that we have collected.

Under the CCPA, “personal information” is defined to be “information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” It includes, but is not limited to “identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers”, “biometric information”, “geolocation data”, et al. “Personal information” does not include publicly available information. For these purposes, “publicly available” means information that is lawfully made available from federal, state, or local government records (California Civil Code section 1798.140 subdivision (o)).

Typical Categories of Personal Information that we collect:

TRISTAR collects and discloses PI only for the purposes of administering your claim, providing related services to you, or offering you employment opportunities. Such collection shall occur when you submit a claim or send in an employment application. The PI we collect and disclose may include:

1. Personal Identifiers such as your name, any alias, your mailing address, telephone number, email address, Social Security number, Driver’s License number, your signature, your digital signature, and other similar identifiers;
2. Personal information, including medical and health information, medical exams, reports, tests, procedures, and prescriptions;
3. Financial and banking information such as bank account and credit/debit card number;
4. Characteristics of protected class or groups under state or federal law, including birthday, sex, marital status and the like;
5. Commercial information, including the purchase of any medical or non-medical equipment relating to your claim;

6. Internet or other electronic network activity information, including, but not limited to, IP address, browsing and search history, and information regarding a consumer's interaction with TRISTAR;
7. Geolocation data such as physical location or movements;
8. Audio, electronic, visual, thermal, or similar information such as voice messages, recorded statements and video evidence;
9. Professional or employment-related information;
10. Education information; and
11. Inferences drawn from any of the information identified above.

How we collect Personal Information

TRISTAR collects your PI from a variety of sources. For example, we may collect PI when you request an employment benefit, insurance coverage or submit a claim to us. The following are the categories of sources from which we may collect your PI:

- Directly from you and your direct interactions with us regarding an insurance, claim, benefits or employment matter;
- Indirectly from you through your authorized representative, insurance agent/producer/broker; legal counsel, medical provider; our claims adjusters; or other third party service providers or business partners;
- Through our websites, when you send us an email or complete a web form making a request regarding your PI;
- From government agencies or public records;
- Through automated technologies and online browser tools, including the use of cookies; and
- From third party service providers or business partners.

Why We Collect, Use, and Share Personal Information

We may use, share, or disclose the PI we collect for one or more of the following business purposes:

- Administering insurance claims under an insurance policy or self-insured program, an employee or governmental benefit and to enable us to make decisions about such claims or benefits;
- Responding to insurance regulator and law enforcement inquiries and investigations;
- Exercising a right, or complying with an obligation, arising in connection with an insurance claim, including a legal right or obligation; or
- Performing statistical analysis in the ordinary course of our administering claims
 - To maintain, customize, and secure your claims information with us.
 - To comply with applicable law, court order, or governmental regulations, including required record retention.

- To process your requests, transactions, and prevent fraud.
- Communicating with you and providing you with support and responding to your inquiries, including employment-related matters, investigating and addressing your concerns and monitoring and improving our responses;
- Helping to maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business;
- For testing, research, analysis, and service development, including developing and improving our services;
- Collecting your PI for purposes of contacting you, sending benefit payments to your direct deposit account, calculating your benefits, and other claim purposes.

We do not collect, use or share your PI without your submitting a claim, a request or an application, or otherwise providing authorization.

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

Categories of Third Parties with whom we share Personal Information:

The categories of third parties with whom we disclose your PI for a business purpose is subject to an agreement by the third party to keep the information confidential and use it only for the specific business purpose. These third parties may include:

1. Third party health providers whom you may be receiving medical treatment from;
2. Third party vendors whom we have retained to secure your information;
3. Third party companies who provide services for your claims or application, including, insurance companies, insurance brokers, attorneys; and
4. Applicable governmental and regulatory agencies;
5. Service Providers whose services require collection of aggregated data for us to provide and analyze claims services.

Under the CCPA, upon verification, you have the right by submitting an “Access Request” to request that we disclose:

- The nature of your PI we collected, used, disclosed and sold, if any, about you over the past twelve (12) months;
- The purpose of the collection, usage, disclosure;
- The specific piece of PI that was collected, used, disclosed, or sold; and
- The categories of third parties to whom we disclosed and sold the information.

Under the CCPA you may also request that we delete personal information we collect from you per a “Deletion Request”.

Subject to verification as described below, please be aware we will not honor your request to delete PI when it is necessary for TRISTAR to maintain that PI to comply with our legal obligations.

If you are a Consumer for purposes of CCPA, you may make an Access Request or a Deletion Request by submitting your request via:

1. Email to: privacy@tristargroup.net including sufficient information to verify your identity; or
2. Complete the E-form [here](#).

Information verification and Subsequent Actions:

Only you, or a person that you authorized to act on your behalf, may make a request related to your PI. In the case of access, your information must be verifiable before we can fulfill your request.

Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected the PI or a person that is authorized to act on your behalf.

In addition, the CCPA makes certain exceptions to providing PI when we respond to or process Access Requests or Deletion Requests. For example, we would not provide PI about another individual where doing so could negatively affect the privacy rights of that individual.

We reserve the right to change or update this notice periodically. When we do, we will post the revised notice on our website at tristarrisk.com under the “Privacy Policy” link.