

Last Updated Date: May 11, 2023

PRIVACY NOTICE

This Privacy Notice describes how MST Insurance Solutions, Inc. (“MSTIS” or the “Company”) collects, uses, shares, or otherwise processes information that relates to you (“Personal Information”).

This Privacy Notice applies to Personal Information that we collect both online and offline, including in connection with the services we provide, through our website (www.mstis.com), and other websites, mobile applications, and digital communications that [link to this Privacy Notice](#) (collectively, our “Services”).

Please note that this Privacy Notice does not apply to any information we collect subject to the Gramm-Leach-Bliley Act (“GLBA”), such as information that we collect about individuals who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and process information relating to these individuals, please refer to our U.S. Consumer Privacy Notice. If you would like a copy of our U.S. Consumer Privacy Notice, please email us at privacy@mstis.com.

If you have any questions about this Privacy Notice, or if you have a disability that prevents or limits your ability to access this Privacy Notice, please email us at privacy@mstis.com. We will work with you to provide this notice in an alternative format.

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1. Personal Information We Collect

The types of Personal Information we collect about you depend on how you interact with us and are further described below. This section describes the types of Personal Information that we may have collected in the previous 12 months and from where the information was sourced.

1.1 Information You Voluntarily Provide to Us

We may collect your Personal Information directly from you, such as when you voluntarily provide your information when completing the “contact us” forms on our site, or you visit our site. The categories of Personal Information that we may collect directly from you include:

- **Identifiers**, such as your name, physical address, email address, telephone number, contact preferences, or other similar identifiers.

1.2 Information We May Generate or Collect Automatically

MSTIS may generate or collect automatically certain types of Personal Information when you interact with us and our Services. The type of Personal Information we collect in this context may include:

- **Identifiers**, such as information that uniquely identifies you or the device through which you interact with our Services, such as your name, email address, username, cookie identifiers, and other unique identifiers.
- **Device Information**, such as information pertaining to the device through which you interact with our Services, such as your IP address, the type of device used to interact with the Services, that device’s operating system and version, MAC address, user settings, or your browser type.
- **Internet or Other Electronic Network Activity Information**, such as information regarding your interactions with us and our Services, which may include pages that you visited while using our Services, information about the links you click (including in what order), the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Commercial Information**, such as a record of Service(s) you purchased from us.
- **Geolocation Information**, such as the region or general location where your computer or device is accessing the Internet.
- **Inferences** drawn from other Personal Information that we collect about you that may relate to your preferences or other matters.

We and our service providers may use cookies, pixel tags, or similar tracking technologies (“**Collection Technologies**”) to gather the information described above when you use, access, otherwise interact with our Services. Below we have described how we use Collection Technologies.

- **Cookies.** Cookies are small text files **placed** in device browsers that store preferences and facilitate and enhance your experience.
- **Web Beacons, Clear GIF, Pixels Tags, and Scripts.** These Collection Technologies are small transparent image files or lines of code to record how you interact with our Services. For example, the use of these technologies may allow us to record that a user has visited a particular web page or clicked on a particular feature. We may also include these types of Collection Technologies in e-mails to understand whether messages have been opened, **acted** on, or forwarded.

Our use of Collection Technologies generally falls into the categories listed below. Please note that these are the main ways of classifying cookies, although there may be other cookies that will not fit neatly into these categories or may qualify for multiple categories.

Strictly Necessary	Cookies that are necessary for our websites to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for
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	services, such as setting your privacy preferences, logging in or filling in forms.
Functional	Enable the website to provide enhanced functionality and personalization based on your interaction with the website. For example, they may allow websites to remember the user's site preferences and choices they make on the site including username and password, region, and language.
Analytics and Performance	These cookies are used specifically for gathering data on how visitors use a website, which pages of a website are visited most often, or if they get error messages on web pages. Some examples of performance cookies are cookies that count page visits, last visit, idle time by a user on a page, bounce rates, and load speeds.

For information on how to manage your preferences as it relates to our use of Collection Technologies, please see the "[Managing Cookie and Other Collection Technologies Preferences](#)" section below.

1.3. Information We Collect from Third-Party Sources

To operate our Services and provide you with the services we believe that may be of interest to you, we may receive your Personal Information from the following third parties:

- **Service Providers**, such as those that assist with operating our website and improve its functionality.

The types of Personal Information we may collect from these third-party sources include the Device Information and Internet or Other Electronic Network Activity Information described above in Section 1.2.

2. How We Use Personal Information

We use Personal Information for a variety of purposes, including:

- **to provide you with access to the Services**, including to operate, troubleshoot, and improve our Services, including our websites and other digital properties.
- **to respond to, notify, or otherwise communicate with you**, including when you contact us with a comment, request, or question; request our Services; or otherwise to send you announcements, technical notices, updates, security alerts, and other administrative messages.
- **to personalize your experiences with us**, including to remember your interests and preferences.
- **for research and analytical purposes**, including to understand how you access and use our Services and to make improvements to our Services. We may do this by analyzing traffic to and through our websites, and user behavior and activity on our websites.
- **for marketing purposes**, including to provide you with information relating to our Services and the products and services of other third parties.

- **for our business purposes**, including to operate and improve our business and Services; internal administration; research, measurement, and similar data analysis; and for any other business purpose permitted by law.
- **for legal compliance and safety purposes**, including to maintain the security of our clients, employees, and property; respond to court orders, lawsuits, subpoenas, and government requests; support legal and regulatory compliance; detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement; and notify you of any other legal or safety issues.
- **for purposes that you have otherwise consented to**, including at the time your Personal Information is collected.

3. How We Disclose Personal Information

MSTIS may disclose data with the following categories of third parties for business purposes including those described below. In no situation do we disclose your Personal Information in exchange for money.

- **Service Providers:** We may disclose your Personal Information with third parties that provide services on our behalf or help us operate the Services (such as customer support, hosting, data analytics, payment processing, email delivery, marketing, ad measurement services, and database management services). These third-party service providers may use your Personal Information only as directed or authorized by us and are prohibited from using or disclosing your information for any other purpose.
- **Third Party Sites and Services.** We may also disclose your information where you direct us to, such as with our business partners.
- **Professional Advisors.** We may disclose your Personal Information to professional advisors, such as lawyers, auditors, and insurers, when necessary.
- **Legal Compliance and Safety.** We may disclose your Personal Information for the compliance, fraud prevention, safety, and legal proceedings described above in Section 2 (How We Use Personal Information).
- **Business Transfers.** We may disclose your Personal Information in connection with a business transaction (or potential business transaction), such as a merger, consolidation, acquisition, or in connection with a reorganization, bankruptcy, or dissolution.
- **Your Consent or Instruction.** We may disclose your Personal Information in situations where we have your consent or instruction to do so.

We may disclose anonymous, de-identified, or aggregate information that cannot reasonably identify you with others for any purpose, as permitted by applicable law. Please note that any Personal Information that you post to a profile, blog, comment section, or forum on our Services or social media pages may be available to other users of those forums or, in some cases, made publicly available.

4. International Data Transfers

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are

different from the laws where you live. In the unlikely event that we transfer information internationally, we endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer Personal Information that originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the EU Standard Contractual Clauses.

For more information about the safeguards we use for international transfers of your Personal Information, please contact us using the contact methods provided below.

5. Retention of Personal Information

We retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law. Please note that in many situations we must retain all, or a portion, of your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, protect against fraudulent, deceptive, or illegal activity, or for another business purpose.

6. Your Choices

Below are rights and choices you may have with respect to your Personal Information. Please note that some of the rights may vary depending on your state of residence.

6.1. Managing Communication Preferences

If you no longer wish to receive marketing communications from us, you can let us know by contacting us using the information available in the [Contact Us](#) section below. Our digital marketing communications may provide unsubscribe or opt-out mechanisms that allow you to modify your communications preferences. Please note that if you opt-out of marketing communications, we may still contact you with non-promotional communications, such as those about ongoing business relations or administrative messages.

6.2. Managing Cookie and Other Collection Technologies Preferences

You can choose how cookies and other Collection Technologies are handled by your device via your browser settings. Some devices allow you to control this through your device settings. If you choose not to receive cookies at any time, websites may not function properly, and certain services will not be provided. Each browser and device are different, so check the settings menu of the browser or device to learn how to change your settings and cookie preferences.

You can find information on how to manage cookie settings on certain browsers via the following links:

- [Cookie settings in Chrome](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Safari](#)

Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#) and [the Digital Advertising Alliance](#).

7. Security Practices

We have implemented certain administrative, physical, and technical security measures to help protect against loss, misuse, or alteration of your Personal Information. While we use commercially acceptable means to protect your Personal Information, no method of transmission over the Internet is 100 percent secure. As a result, we cannot guarantee the absolute security of your Personal Information. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of Personal Information.

8. Links to Other Sites

Our Services may provide links to Internet sites, content, or videos (embedded or direct links) maintained by third parties. We are not responsible for the sites, content, or videos available via those links, and we have not reviewed the privacy practices of those third parties. We encourage you to review the privacy practices of any third-party sites that you choose to access.

9. Children's Privacy

Our Services are only intended for individuals 18 years old or older. If you are under 18 years of age, please do not register for or use any of our Services or provide us any Personal Information about yourself.

We are a general audience site, and do not direct any of our content specifically at children under eighteen (18) years of age. We do not knowingly or intentionally collect Personal Information through the site from children under eighteen (18) years of age.

If you are a parent or guardian and you are aware that your child has provided us with their Personal Information, please contact as described below. If we become aware that a minor has provided us Personal Information or otherwise used our Services in violation of the Policy, we will take steps to remove that information.

To request the removal of information about a minor, parents or guardians may submit a request to one of the following sources with the subject line "Removal of Minor Information." Such requests must come from the minor's parents or guardian; minors may not submit information to us via email.

- Mail: ATTN: Privacy Compliance Officer, MSTIS, 21241 South Western Avenue, Suite 200, Torrance, CA 90501
- Email: privacy@mstis.com

Your submission by mail or email should include the following information:

- the nature of your request;
- that the request is related to the "Removal of Minor Information;" and

- your name, street address, city, state, zip code, and e-mail address.

We will not accept any Request for Removal of Minor Information via telephone or facsimile.

10. Changes to this Privacy Notice

We may update this Privacy Notice periodically, noting the date of revision at the top. If we make any material changes in the way we collect, use, and/or disclose Personal Information, we will endeavor to provide you with notice before such changes take effect, such as by posting a prominent notice on the MSTIS website.

11. Contact Us

If you have questions about our information practices, please contact us using the following methods:

- By e-mail: privacy@mstis.com
- By mail: ATTN: Privacy Compliance Officer, MSTIS, 21241 South Western Avenue, Suite 200, Torrance, CA 90501
- By phone: 844-347-3374

12. Information for California Residents – California Privacy Rights

California law requires us to disclose the following information with respect to our information practices. If you are a California resident, this section applies to you in addition to the rest of the Privacy Notice.

12.1. Categories of Personal Information Collected and Sources

Section 1 ([Personal Information We May Collect](#)) identifies the categories of Personal Information that we may have collected in the preceding 12 months, and the sources from which we obtain such information.

12.2. Purposes for Collection.

We collect and use Personal Information for the business or commercial purposes described in Section 2 ([How We Use Personal Information](#)).

12.3. Categories of Personal Information Disclosed and Categories of Recipients

We may have disclosed any Personal Information collected in the preceding 12 months to our Service Providers for purposes consistent with this Privacy Notice. We may also disclose any Personal Information we collect: (1) to our Professional Advisors; (2) for Legal Compliance and Safety purposes; (3) as a result of a Business Transfer; or (4) based on your consent or instruction, all four of which are described in the "[How We Disclose Personal Information](#)" section above.

12.4. California Privacy Rights

Subject to certain limitations, California residents have the following rights regarding their Personal Information.

- **Request to Know.** You have a right to request that we disclose what Personal Information we have collected about you, including the categories of your Personal Information we have collected, the categories of sources from which such Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing your Personal Information, the categories of third parties to whom we disclose your Personal Information, and the specific pieces of your Personal Information that we maintain.
- **Request to Delete.** You have a right to request that we delete Personal Information that we have collected about you, subject to certain exceptions.
- **Request to Correct Inaccurate Personal Information.** You have a right to request that we correct inaccurate Personal Information that we may maintain about you.
- **Request to Opt Out of the “Sale” or “Sharing” of Your Personal Information.** You have a right to opt out of the “selling” or “sharing” of your Personal Information; however, we do sell or share any Personal Information, including the Personal Information of individuals under 16 years of age.
- **Right to Limit Use and Disclosure of Sensitive Personal Information.** You have a right to limit the use of your “sensitive personal information” (as defined by applicable law) to certain purposes permitted by law. As noted above, however, MSTIS does not collect sensitive personal information.
- **Right to No Discrimination.** You have a right not to receive discriminatory treatment for the exercise of your privacy rights.

12.5. Exercising Your California Privacy Rights

- **How to Submit a Request to Know, Request to Delete, or Request to Correct.** You may submit a request by contacting us at privacy@mstis.com or 844-347-3374.
- **Authorized Agent.** Only you, or someone legally authorized to act on your behalf, may submit a request relating to your Personal Information. To authorize an agent to submit a request on your behalf, please provide written authorization signed by you and your designated agent. You may contact us at privacy@mstis.com for additional instructions.
- **Verification.** To protect your privacy, we will take steps to verify your identity before fulfilling your request. These steps may involve asking you to provide sufficient information that allows us to confirm you are the person about whom we collected Personal Information or an authorized representative, or to answer questions regarding your use of our Services or recent interactions with us.

12.6. Do Not Track Disclosure

Some browsers offer a “Do Not Track” privacy preference. Generally, when a user turns on the “Do Not Track” Signal, their browser sends a message to websites requesting that the user not be tracked. Our websites currently do not respond to “Do Not Track” signals.

12.7. California Shine the Light

California residents have the right to request information from a company regarding the manner in which it shares certain categories of Personal Information with third parties for their direct marketing purposes, in addition to the rights set forth above.

Under California law, you have the right to send us a request at the designated address listed above in the “Contact Us” section to receive the following information:

- The categories of information we disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year;
- The names and addresses of the third parties that received the information; and
- If the nature of the third party’s business cannot be determined from their name, examples of the products or services marketed.

To make such a request, please email us at privacy@mstis.com. In your email, please attest to the fact that you are a California resident and provide a current California address for our response. Any such request must include “California Privacy Rights Direct Marketing Information Request” in the subject line, and include your name, street address, city, state and ZIP code in the body. Please note that we are only required to respond to one request per customer each year.