

# Privacy Notice for California Consumers

This Privacy Notice for California Consumers supplements the information contained in the Master Privacy Notice for Old Republic Risk Management and applies to consumers that reside in the State of California. The terms used in this Privacy Notice have the same meaning as the terms defined in the California Consumer Privacy Act (“CCPA”).

## What Personal Information We Collect

In accordance with the CCPA, personal information is 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. Personal information does not include:

Information outside the scope of the CCPA such as:

- Health or medical information covered by the Health Insurance Portability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA).
- Personal Information covered by the Gramm-Leach-Bliley Act (GLBA), the Fair Credit Reporting Act (FCRA), the California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994,
- Publicly available information or lawfully obtained, truthful information that is a matter of public concern, and
- De-identified or aggregated consumer information.

Please see the chart below to learn what categories of personal information we may have collected about California consumers within the preceding twelve months, the sources of and business purposes for that collection and the third parties to whom the information has been disclosed, if any.

Category	Examples	Sources	Business Purpose for Collection	Categories of Third Parties with Whom Information is Disclosed
Identifiers	Real name, alias, postal address, unique personal identifier, online	Consumers, Lenders, Brokers, Attorneys, State Department of	Regulatory Compliance, underwriting or providing other products or services, responding to	Service providers associated with the transaction for a

	<p>identifier, Internet protocol address, email address, account name, social security number, driver's license number, passport number or other similar identifiers</p> <p>Social security number, driver's license number, passport number are collected</p>	<p>Insurance, Doctors / Hospitals / Medical Providers, States Department of Motor Vehicles, Leasing Companies, Insureds, Government Agencies, National Council on Compensation Insurance, Third-Party Administrators</p>	<p>policyholder/consumer claims, inquiries, or complaints, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity. Other audit or operational purposes.</p>	<p>business purpose</p>
<p>Personal information described in California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p>	<p>Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit</p>	<p>Consumers, Lenders, Brokers, Attorneys, State Department of Insurance, Doctors / Hospitals / Medical Providers, States Department of Motor Vehicles, Leasing Companies, Insureds, Government Agencies, National</p>	<p>Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity. Other audit or operational purposes.</p>	<p>Service providers associated with the transaction for a business purpose</p>

	<p>card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.</p> <p>Social security number, driver's license number or state identification card number, passport number, bank account number are collected</p>	<p>Council on Compensation Insurance, Third-Party Administrators</p>		
<p>Characteristics of protected classifications under California or federal law</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religions or creed, marital</p>	<p>Consumers, Lenders, Brokers, Attorneys, State Department of Insurance,</p>	<p>Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints. Other</p>	<p>Service providers associated with the transaction for a</p>

	<p>status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, or genetic information (including familial genetic information).</p> <p>Marital status, sex, physical disability, is collected</p>	<p>Doctors / Hospitals / Medical Providers, States Department of Motor Vehicles, Leasing Companies, Insureds, Government Agencies, National Council on Compensation Insurance, Third-Party Administrators</p>	<p>audit or operational purposes.</p>	<p>business purpose.</p>
<p>Commercial Information</p>	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Consumers, Lenders, Brokers, Attorneys, State Department of Insurance, Doctors / Hospitals / Medical Providers, States Department of Motor Vehicles,</p>	<p>Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints. Other audit or operational purposes.</p>	<p>Service providers associated with the transaction for a business purpose.</p>

		Leasing Companies, Insureds, Government Agencies, National Council on Compensation Insurance, Third-Party Administrators		
Biometric Information	Physiological, genetic, or behavioral characteristics, imagery of the iris, retina, fingerprint, faceprint, voiceprint, handprint, keystroke patterns, gait patterns, other physical patterns involving sleep, health, or exercise data.	Consumers, Policy Holders, Third-Party Administrators	Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints. Other audit or operational purposes. State loss control regulatory - claim & loss trend triggered loss control service election/declination	Service providers associated with the transaction for a business purpose and state regulators.
Internet or other electronic network activity	Browsing history, search history, information about a consumer's interaction with a website, application, or advertisement.	Consumers, Lenders, Brokers, Attorneys, State Department of Insurance, Doctors / Hospitals / Medical Providers, States Department of Motor Vehicles,	To provide access to certain online services. To understand the interests of visitors to our online services, to support certain features of our site, for navigation and to display certain features more effectively. Detecting security incidents, protecting against malicious, deceptive,	Not Disclosed

		Leasing Companies, Insureds, Government Agencies, National Council on Compensation Insurance, Third-Party Administrators	fraudulent, or illegal activity. Other audit or operational purposes.	
Geolocation data	Geographic tracking data, physical location, and movements	Insured, Agents, Captives, Reinsurers	Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity.	Not Disclosed
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	Consumers, Lenders, Brokers, Attorneys, State Department of Insurance, Doctors / Hospitals / Medical Providers, States Department of Motor Vehicles, Leasing Companies, Insureds, Government Agencies, National Council on Compensation Insurance,	Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints. Other audit or operational purposes. State loss control regulatory - claim & loss trend triggered loss control service election/declination	Service providers associated with the transaction for a business purpose.

		Third-Party Administrators		
Professional or employment related information	Current or past employment history, performance evaluations, disciplinary records, investigations, awards, earnings, compensation and payroll records, benefit records, employment application, resume, background checks, contracts and agreements or termination records, leave documentation, medical records, or workers compensation records.	Consumers, employee, former employee, perspective employee.	If an employee, perspective, and former employee of Old Republic Risk Management, for operational and HR purposes.	Not Disclosed
Nonpublic Education information (FERPA)	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class list, student schedules, student identification codes, student	Consumers, employee, former employee, perspective employee.	If a consumer, employee, perspective, and former employee of Old Republic Risk Management, for operational and HR purposes.	Not Disclosed

	financial information, or student disciplinary records.			
Inferences from other personal information to create a profile of a person	A person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Third-Party Administrators, Regulators, Policyholders	Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints. Other audit or operational purposes. State loss control regulatory - claim & loss trend triggered loss control service election/declination.	Service providers associated with the transaction for a business purpose.

## What Personal Information We Disclose and Why We Disclose It

The CCPA requires us to tell you what categories of personal information we “sell”, “share” or “disclose.” We do not sell and will not sell your personal information as that term is commonly understood. We also do not sell and will not sell your personal information, including the personal information of persons under 16 years of age, as that term is defined by the CCPA. We do not share your personal information, including the personal information of persons under 16 years of age, as that term is defined in the CCPA. When it is necessary for a business purpose, we may disclose your personal information with a service provider or contractor, and we enter into a contract with the service provider or contractor that limits how the information may be used and requires the service provider to protect the confidentiality of the information.

In the preceding twelve months, we have disclosed the following categories of personal information for the following business purposes. Where the personal information is shared with third parties, as that term is defined in the CCPA, the category of the third party is indicated.

Category	Examples	Business Purpose for Disclosure
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<p>Identifiers</p> <p>(Including social security number, driver's license number, and passport number)</p>	<p>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</p>	<p>Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity. Other audit or operational purposes.</p>
<p>Personal information described in California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p> <p>(Including Social security number, driver's license number or state identification card number, passport number, and bank account number)</p>	<p>Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>"Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.</p>	<p>Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity. Other audit or operational purposes.</p>
<p>Characteristics of protected classifications under California or federal law</p> <p>(Including marital status, sex, and</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religions or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, or</p>	<p>Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints. Other audit or operational purposes.</p>

physical disability)	genetic information (including familial genetic information).	
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Underwriting or providing other products or services, responding to policyholder/consumer claims, inquiries, or complaints.
Biometric information	Physiological, genetic, or behavioral characteristics, imagery of the iris, retina, fingerprint, faceprint, voiceprint, handprint, keystroke patterns, gait patterns, other physical patterns involving sleep, health, or exercise data.	Not disclosed
Internet or other electronic network activity	Browsing history, search history, information about a consumer's interaction with a website, application, or advertisement.	To provide access to certain online services. To understand the interests of visitors to our online services, to support certain features of our site, for navigation and to display certain features more effectively. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity. Other audit or operational purposes.
Geolocation data	Geographic tracking data, physical location, and movements	Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity.
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	Not disclosed
Professional or employment related information	Current or past employment history, performance evaluations, disciplinary records, investigations, awards, earnings, compensation and payroll records, benefit records, employment application, resume, background checks, contracts and agreements or termination records, leave documentation, medical records, or workers compensation records.	If an employee of Old Republic Risk Management, for operational purposes. If an insured, for claims purposes. Other audit or operational purposes.
Nonpublic Education information	Education records directly related to a student maintained by an educational institution or party	Not disclosed

	acting on its behalf, such as grades, transcripts, class list, student schedules, student identification	
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We may also transfer to a third party the personal information of a consumer as an asset that is part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of the business.

## Our Retention of Your Personal Information

The length of time that we retain personal information largely depends upon the purpose for which the information was collected rather than the category of the information as set forth in this Notice. When establishing retention periods, we consider applicable statutes of limitation and legal and regulatory requirements and guidelines. Personal information is generally retained for periods of time that permit the company to meet its legal and regulatory obligations.

## Your Rights and Choices

The CCPA provides California consumers with certain rights regarding their personal information. This chart describes those rights and certain limitations to those rights.

Right	What This Means
Notice	At or before the time your personal information is collected, you will be given written notice of the categories of personal information to be collected, the purposes for which the categories of personal information will be used, and whether that information is sold or shared.
Access	At your verifiable request, but no more than twice in a twelve month period, we shall disclose to you: 1) the categories of personal information we have collected about you, 2) the categories of sources for the personal information we collected about you, 3) our business or commercial purpose for collecting, selling or sharing your personal information, 4) the categories of third parties to whom we disclose your personal information, 5) the specific pieces of information we have collected about you, 6) the categories of personal information disclosed about you for a business purpose and the categories of persons to whom your personal information was disclosed for a business purpose, and 7) if we sold or shared personal information, the categories of personal information sold or shared and the categories of third parties to whom it was sold or shared.
Deletion	You have the right to request that we delete any of your personal information that we collected from you, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers and contractors to delete) your personal information from our records unless an



	<ul style="list-style-type: none"><li>• Deny you goods or service</li><li>• Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties</li><li>• Provide a different level or quality of goods or services</li><li>• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services</li></ul>
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## To Exercise Your Rights

### To Opt-out of the Sale or Sharing of Your Personal Information

The CCPA gives consumers the right to direct a business that sells or shares personal information about the consumer to third parties not to sell or share the consumer’s personal information. We do not sell and will not sell your personal information as that term is commonly understood. We also do not sell and will not sell your personal information, as that term is defined by the CCPA. We do not share your personal information as that term is defined in the CCPA.

### To Limit the Use of Sensitive Personal Information

The CCPA gives consumers the right to direct a business to limit the use of the consumer’s sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services and certain other limited uses as described in the CCPA and applicable regulations. We do not use or disclose sensitive personal information for purposes other than those purposes specified in Section 7027, subsection (m) of the California Consumer Privacy Act Regulations. If we begin using or disclosing your sensitive personal information outside of those purposes, then we will provide you with the option to limit our use or disclosure through a clear and conspicuous link on our internet homepage.

### To Request Access to, Correction or Deletion of Your Personal Information

To exercise your access, correction or deletion rights described above, please submit a verifiable consumer request to us by either: Calling us at 1-855-797-3432 or contacting us through our website <https://www.orm.com>.

Only you or your representative that you authorize to act on your behalf (Authorized Agent) can make a verifiable consumer request for your personal information. You may

also make a request for your minor child. The verifiable request must provide enough information that allows us to reasonably verify you are the person about whom we collected personal information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and to confirm the personal information relates to you.

We work to respond to a verifiable consumer request within 45 days of its receipt. If we require additional time, we will inform you of the extension period (up to an additional 45 days), and the reason for the extension in writing. If you have an account with us, we will deliver our response to that account. If you do not have an account with us, we will deliver our response by mail or electronically, depending on your preference. The response we provide will also explain any reasons why we cannot comply with a request.

You may only make a consumer request for access twice within a twelve-month period. Any disclosures we provide will apply to the twelve-month period preceding the consumer request's receipt.

## Contact Us

If you have any questions regarding our Privacy Notice or practices, please contact us or send your written request to: [PrivacyRequest@orm.com](mailto:PrivacyRequest@orm.com), 1-855-797-3432, PO BOX 2939 Milwaukee, WI 53201-2939.