

## Document Control

### Distribution



Document Name:	CIG Privacy Policy
Version No:	Version 2.0
Version Date:	December 19, 2014
Author:	Matthew J. Brasch
Issued By:	Legal Department
Issue Date:	December 19, 2014

### Version Control

Version	Date	Comments
1.0	2/12/14	Approved & Implemented Privacy Policy
2.0	12/19/14	Revised mailing address for notification
2.0	11/30/15	Annual review – no changes. MJB
2.0	10/26/16	Annual review – no changes. MJB
2.0	11/2018	Annual review – no changes at this time. Changes are being contemplated for adoption in 2019. MJB

This document is to be reviewed and updated as required. At a minimum an annual review will be performed.

### Approval

Name/Title	Signature	Date
David F. Raczenbek, CLO	/s/ 	12/19/14
David F. Raczenbek, CLO	/s/ 	11/20/18

## **Cumberland Insurance Group Customer Privacy Statement**

Your relationship with us is important. We value your business and strive to preserve the trust you place in us. The Companies of the Cumberland Insurance Group recognize and respect your expectation that your personal information remains confidential and secure.

The purpose of this statement is to outline the privacy standards utilized by the Cumberland Insurance Group for the collection, use, retention and safeguarding of non-public personally identifiable information.

### **The Information We Collect**

Non-public personally identifiable information ("Information") is information that identifies you and is not available to the general public. The following sections tell you more about how and when we collect your Information.

#### Information We Obtain From You

We get most information directly from you. During the quoting, application, or claims handling processes you might give us Information such as your name, address, phone number, email address, Social Security number, driver's license number, and date of birth.

We may also obtain information through our website. We obtain information voluntarily provided by you when you use our Online Bill Payment Service, Online Claims Reporting Service, and Agency Link portal. To process your Online Bill Payment transaction, we will share all information you provide with a third party credit card/debit card processor, which will safeguard your personal information from disclosure.

#### Information About Your Transactions

We may collect Information about your transactions and experiences with us and others, such as your payment history, claims, coverage, and vehicle changes.

#### Information From Third Parties

We may receive Information about you from consumer reporting agencies, which provide us with motor vehicle reports, claim reports, and/or insurance score information where permitted by law. When you ask for a rate quotation, we may obtain a motor vehicle report, claim report and/or insurance score if permitted by applicable state law. Our inquiry will not affect your credit score or credit rating. As permitted by law, we may also review your motor vehicle record, claims history, and/or insurance score in connection with any renewal.

### **Access to and Correction of Personal Information**

You have the right to access and correct the personal information that we have collected from or about you. To do so, simply contact Cumberland's Legal Department. If you'd like to correct information that you provided to us, our representative will make the appropriate adjustments to Cumberland's records. If you wish to correct personal information provided to Cumberland by a

third party (such as a consumer reporting agency) the representative will provide you with the applicable third party's contact information.

### **Why we collect and how we use information**

We collect and use information for business purposes with respect to our insurance business and you. All non-public personal information collected and maintained by us is used for specific business purposes enabling us to underwrite your policies, process your claims, ensure proper billing, service your policies and inform you of other products that may suit your needs.

### **When and How We Disclose Information**

Information about our customers or former customers will only be disclosed as permitted or required by law. Information we collect about you is maintained in your policy and/or claims records.

We use this Information to process and service your policy; to settle claims; with your consent; or as directed by you. We may also disclose it to persons or organizations as necessary to perform transactions you request or authorize. Information about our former customers and about individuals who have obtained quotes from us is safeguarded to the same extent as Information about our current policyholders.

Following are some examples of how we may disclose Information:

- We must exchange Information about you with our agents, investigators, appraisers, attorneys, and other persons who are or will become involved in processing your application and servicing your policy or any claims you may make.
- When you are involved in a claim, policy information is provided to adjusters and the businesses that will repair your property.
- We may share Information with persons or organizations that we have determined need the Information to perform a business, professional, or insurance function for us. These include businesses that help us with administrative functions. All of these entities are obligated to keep the Information that we provide to them confidential and to use the Information only for the purpose for which the Information was provided.
- Information may be provided to organizations conducting actuarial research or audits. In this case, you will not be individually identified in any research report. The organization must agree not to re-disclose the Information and the Information will be returned to us or destroyed when it is no longer needed.
- We may also share your Information for other permitted purposes, including:
  - with another insurance company if you are involved in an accident with their insured;
  - with our reinsurers;
  - with insurance-support organizations;
  - with medical professionals or institutions in order to verify coverage or conduct operations or services audits;

- with state insurance departments or other governmental or law enforcement authorities if required by law or to protect our legal interests or in cases of suspected fraud or illegal activities;
- if ordered by a subpoena, search warrant or other court order.

### **How we protect information**

We treat information in a confidential manner. We do not sell consumer information. We afford prospective and former customers the same protection as existing customers with respect to the use of personal information. Our employees are required to protect the confidentiality of information. Employees may access information only when there is an appropriate reason to do so, such as to administer your claim or policy. We maintain physical, electronic, and procedural safeguards to protect information.

### **Additional Information for Our Internet Users**

We continuously seek to improve our websites. We are interested in how visitors use our websites, what they like and dislike, and where they have problems. We may gather data on how users navigate our sites so we can make them easy places to do business. Our tools may gather data such as what browser a person uses or even what pages are most popular.

We use cookies to improve your experience while using our websites. Cookies are small files that are stored on your computer. They do not contain any personally identifiable information about you. They help us personalize your experience when you return to our websites, and they are required for certain portions of our websites. We may use “cookies” to track an individual’s use of our websites for any single session. This cookie is deleted once the individual closes his or her browser. Most browsers let you determine whether or not you accept our cookies.

We also provide some links to third-party websites that are not owned by Cumberland. Cumberland has no control over their privacy practices and assumes no responsibility in connection with your use of their websites. We recommend that you check the privacy policy of any website before you provide any personally identifiable information.

### **Changes to This Privacy Policy**

We may modify our privacy policy from time to time. The most recent version is always posted at [cumberlandgroup.com](http://cumberlandgroup.com). Each of our policyholders receives a copy of our privacy policy at least once per year. In addition, in the event that we make a significant change to our privacy practices, we will send a revised copy of our privacy policy to each of our current policyholders.

## **What to Do if You Have Privacy or Security Concerns**

If you have a concern about privacy or security at Cumberland, we want to hear about it by mail or email.

Please write to us at:

Privacy Policy Administration  
ATTN: Legal Department  
Cumberland Insurance Group  
P.O. Box 556  
Bridgeton, NJ 08302

or email us at [privacypolicy@cumberlandgroup.com](mailto:privacypolicy@cumberlandgroup.com)

or contact the Legal Department toll free at 1-800-232-6992.

This Privacy Policy applies to all of the following Cumberland Insurance Group companies:

Cumberland Mutual Fire Insurance Company  
Cumberland Insurance Company, Inc.

The Effective Date of the revised Privacy Policy is December 19, 2014.

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