

**WEBSITE PRIVACY POLICY**  
**VERSION 1.0**  
**LAST REVISED ON: DECEMBER 6, 2021**

***Summary of this Privacy Notice***

At Broad Arrow Group, Inc. (“BAG”), we respect your privacy. This page explains how we treat your information. We use your information to provide and improve our services. By using BAG’s website or services, you agree to the collection and use of information in accordance with this Privacy Policy.

We do not ever sell your personal information to anybody. We will only disclose your information to hold up our responsibilities to you, to show you things that you might be interested in or to customize your experience with us. You can make choices about how your information is collected and used.

We can only speak for ourselves so this Privacy Notice does not apply to anybody else. This includes other products or websites that may be linked within our website.

***Information We May Collect About You***

BAG and people who represent BAG collect personal information in several situations during business. It is completely up to you what information you voluntarily provide to us. Depending on the situation, personal information we collect can include:

- Contact information. For example, this can include your name, mailing address, e-mail address, telephone number, birth date, marital status and other information;
- Financial information. For example, this can include credit card or bank information.
- Information about your driver’s license, or from motor vehicle/driving records about you, other drivers, or household members. We assume you have permission to share information about any other people;
- Demographic information and interests;
- Information about your business with us or other BAG companies, such as information about the products and services you request or purchase;
- Information about your other vehicles;
- Employment information;
- Other information submitted by you. This may include information you have filled out in surveys, polls, questionnaires, social media or similar items; and
- Any other information we may collect as permitted or required by law.

We may collect this information from you or motor vehicle and driver licensing authorities, financial institutions, or other third-parties.

***Use of Personal Information***

BAG generally uses personal information for the following reasons:

- Verifying your identity;
- Customizing your interactions with us;
- Maintaining business records for reasonable periods, and generally managing and administering our business;
- Protecting BAG and you against fraud;
- Improving our customer service and website;
- Keeping your information accurate and up to date;
- Meeting legal, regulatory, insurance, and security requirements;
- If law enforcement requires it to investigate or stop a crime;
- To hold up our end of our business transaction with you;
- To analyze our business and identify trends;

- To show you content you might be interested in, or to market our services to you or other services according to your interests. You can opt-out of these communications if you want;
- Otherwise as permitted or required by law.

### ***Disclosing and Sharing of Your Information***

To be clear, we do not sell your information to anybody. However, we may have to disclose or share some information for the reasons listed above. We may, for example, disclose your information to:

- Regulatory and self-regulatory agencies;
- Other BAG companies, affiliates, subsidiaries, or partners;
- Licensed agencies and brokerages that have referred you to us;
- If we are required to by a court subpoena or other law;
- Market our products to you or other products that fit your interests;
- Third parties that perform professional, business services for us;
- Maintain the regulation of our business;
- Law enforcement to investigate or stop a crime;
- To hold up our end of our business transaction with you;
- Conduct research or compile statistics;
- As otherwise permitted or required by law.

If the control or ownership of BAG ever changes, we will transfer your information to the new owner and the same protection will apply unless a law says otherwise.

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

If you want to update or see any information that we have about you, just let us know. If you want to correct information we got from another party (such as a credit reporting agency), we can provide you with that party's contact information. We may not be able to share information involved in an ongoing investigation.

### ***Transfer of Your Personal Data***

Your information, including personal data, is processed at BAG's operating offices and in any other places where BAG affiliates or the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers and cloud-based systems located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

BAG will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

### ***Website Analytics***

We use Google and Adobe Analytics to help us with collecting various pieces of demographic information. Specifically, we have used geographic and general website movement pattern features. You can opt-out of these features that we use by applying [Adobe's](#) or [Google's](#) currently available opt-outs.

### ***Usage Data***

Usage Data may be collected automatically when using our website. Usage Data may include information such as your device's Internet Protocol address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When you access this website by or through a mobile device, we may collect certain information automatically, including,

but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data. We may also collect information that your browser sends whenever you visit our website or when you access our services by or through a mobile device.

### ***Information from Third-Party Social Media Services***

We may allow you to create an account and log in to use our services through the following Third-party Social Media Services:

- Google
- Facebook / Instagram
- Twitter
- LinkedIn

If you decide to register through or otherwise grant us access to a Third-Party Social Media Service, we may collect personal data that is already associated with your Third-Party Social Media Service's account, such as your name, email address, activities or contact list associated with that account.

You may also have the option of sharing additional information with BAG through your Third-Party Social Media Service's account. If you choose to provide such information and personal data, during registration or otherwise, you are giving BAG permission to use, share, and store it in a manner consistent with this Privacy Policy.

### ***Cookies***

A "cookie" is a piece of data stored on the user's computer when you visit a website. Cookies are used on our site to enhance and simplify your visit. We use cookies to gather information on your preferences to provide you with a more custom experience. For example, we send a cookie whenever you start a session with our Services. This allows easier future visits.

You can block the use of these cookies by adjusting your browser's or mobile device's settings. If you reject a cookie, you may still use our website but will not have access to these enhancements.

### ***Public Forums***

Our website or social media account may contain a form for commenting. Just remember that anything you post on a publicly commentable forum becomes public.

### ***Links***

Our website contains links to other sites. Please be aware when leaving our site and to read the privacy statements of other websites. This Privacy Notice only applies to our website.

### ***Surveys & Contests***

Sometimes we have a survey or contest. These are 100% voluntary. Any information collected from a survey or contest will only be used to make our website or products better and to contact any winners.

### ***Affiliate Programs***

An affiliate is another member of the BAG family of companies. If you purchase something from an affiliate of ours, we will need to collect some information. You agree we may share your data and personal information with any BAG affiliates.

## ***Security***

We do our best to protect your personal information. We use firewalls, encryption and Transport Layer Security (TLS). We use current technology and tools to keep your information safe. But nothing is perfect so please be careful and use strong passwords.

## ***Our Policies Concerning Children***

BAG does not knowingly collect personal information from anyone under 13 years old without parental consent. If we do accidentally receive this information, we will delete it. If you think we have improperly received a child's information, please contact us at [privacy@broadarrowgroup.com](mailto:privacy@broadarrowgroup.com).

## ***Your Rights***

We may from time to time send you communications regarding our services which you have expressed an interest in, or we feel may be of interest to you. You can opt out of receiving these marketing materials and communications at any time by using the unsubscribe link contained in all relevant communications to you or contacting us at [privacy@broadarrowgroup.com](mailto:privacy@broadarrowgroup.com). You can also opt-out of receiving direct marketing material from us. You have the right to request details of the processing activities that we carry out with your personal information by making a data subject access request (DSAR). If the request is 'manifestly unfounded or excessive', or further copies are requested, the data controller may charge a reasonable administration fee. To make a request, please contact us at [privacy@broadarrowgroup.com](mailto:privacy@broadarrowgroup.com). You also have the following rights:

- the right to access;
- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (the "right to be forgotten");
- the right to restrict the way in which we are dealing with and using your information;
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (the "right to portability");
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

These rights are subject to certain safeguards and limits or exemptions. To exercise any of these rights, you should contact BAG's Privacy and Data Protection Officer at [privacy@broadarrowgroup.com](mailto:privacy@broadarrowgroup.com).

## ***Your California Privacy Rights***

You have several rights concerning your personal data. Specifically, you have the right:

- To receive a copy of the data that we have collected from you or disclosed about you in the past 12 months;
- To correct the data that we have;
- To have your data deleted;
- To opt-out of the sharing or selling of information. *We do not sell any personal information.* We only share personal information with third parties to market directly to you if you either specifically opt-in or have the opportunity to opt-out and elect not to opt-out of that sharing. If you are under 16 years old, then you must opt-in to this type of sharing

We will not discriminate against any person exercising any of these rights. These rights may be limited by law. For example, we may not be able to delete your data so we can defend ourselves in a lawsuit. Some data may be exempt from these obligations. We will need to verify your identity before fulfilling these requests.

Please submit your request at [privacy@broadarrowgroup.com](mailto:privacy@broadarrowgroup.com).

If we receive a "do not track" signal from your internet browser we don't currently change anything because professionals and lawmakers have not agreed on what can and should be done.

### ***Changes to Our Privacy Notice***

We must modify this Privacy Notice from time to time. We will make big changes easy to find. If an update changes your rights, we will let you know directly. We keep old versions of this Notice archived. Our website will contain the most current version of our Privacy Policy.

### ***Questions***

If you have any questions about this privacy notice, or need to contact us for any reason simply contact our Privacy and Data Protection Officer [privacy@broadarrowgroup.com](mailto:privacy@broadarrowgroup.com).