



Tellus Brokerage Connections California Privacy Notice/Notice at Collection

Last updated: June 2023

Overview

Maintaining the privacy and security of your personal information is integral to the culture of Tellus Brokerage Connections and its subsidiaries (also referred to collectively and individually as “Tellus,” “we,” “our,” and “us”). In doing so, we want to provide transparency regarding how and why your data is collected, how it is used, and with whom it may be shared. This document, as well as the [Website Privacy and Security Statement](#), set forth how we will interact with your personal information.

It is important to note that we do not knowingly sell your personal information or share such information for cross-contextual advertising. As such, there is no link on our websites to opt-out of such activity.

This Notice is directed to California residents and relates to the collection, use, and disclosure of personal information covered by the California Consumer Privacy Act (CCPA). This Notice also provides further information about our practices, along with details concerning “Right to Know” and “Right to Delete” requests.

Collection and Use

It is necessary for us to collect certain personal information in order to provide products and services requested or to comply with federal and state laws and other legal obligations.

We may collect, or may have collected in the past 12 months, the following categories of personal information:

- Personal identifiers (ex: name, contact information)
- Demographic/Protected class information (ex: marital status, sex)
- Biometric information (ex: voiceprints or fingerprints)
- Commercial information (ex: purchase histories, transaction information)
- Professional or employment-related information
- Education information
- Financial-related data (ex: account number, account dates and balances, credit data, financial transactions)
- Geolocation (ex: your IP address when visiting a Crump website)
- Internet or other electronic network activity information (ex: browsing history)
- Audio, electronic, visual, thermal or olfactory information (ex: voice recordings when you contact a call center)
- Personally identifiable health information
- Background/criminal record
- Marketing opt-out/preference information
- Inferences drawn from any of the above information

It is necessary for Tellus to share certain personal information with affiliates and/or trusted service providers to provide our products and services and to comply with legal, regulatory, and contractual obligations. We may disclose each of the categories of personal information described above to such external or affiliated companies for the reasons noted above. Below are categories of third parties with whom we share personal information:

- Affiliates and other entities in the Tellus family;
- Businesses, such as insurance companies, with which we partner to offer products and services for our customers or prospective customers;
- Service providers that provide various services to us, such as those we use to process requested insurance coverage, help detect and prevent fraud, and improve our online services;
- Government entities and other third parties as needed for legal or similar purposes, such as:





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- To comply with our legal obligations;
- To facilitate a merger, acquisition, sale, bankruptcy, or other disposition of some or all of our assets;
- To exercise or defend legal claims.

Purpose for Collection and Use

We collect information directly from you and from other sources in order to provide products and services required or to comply with federal and state laws and other legal obligations. In the past 12 months, we may have collected and used personal information for the following purposes:

- Deliver, manage, and support products and services (ex: account information, statements, notifications);
- Manage business operations;
- Assess and manage risk, manage internal financials;
- Meet legal, regulatory, or compliance requirements;
- Manage fraud and financial crimes;
- Support and optimize channels and interactions (ex: improving website performance);
- Identify and recommend new products and services;
- Perform services on behalf of another entity or business (ex: processing data for healthcare providers);
- Provide employee benefits and other services (ex: retirement, health), manage hiring, employment, performance, and staffing.

Sources of Personal Information

We may collect personal information about you from various sources in the course of providing products and services to you. Below is a list of the categories of sources from which we may obtain data:

- Directly from you or your guardians/representatives;
- Outside service providers, vendors, and third parties (such as insurance companies, intermediaries, brokers, or agents) from which we collect personal information or market data as part of providing products and services, completing transactions, or supporting operations;
- Outputs from analytics;
- Websites, mobile applications, and social media;
- Our affiliates or subsidiaries;
- Public records or publicly available data.

No Sale Policy

As noted above, Tellus does not knowingly sell personal information or share such information for cross-contextual advertising. As such, there is no link on our websites to opt-out of such activity.

Consumers Under 16 Years of Age

Tellus does not knowingly sell the personal information of minors under the age of 16 or share such information for cross-contextual advertising.

Notice of Right to Limit Use of Sensitive Personal Information

Tellus only collects/processes sensitive personal information for permissible purposes that do not infer characteristics about you, therefore there is not an opt-out for the use of sensitive personal information.

Retention of Personal Information

Tellus has established product and business-level criteria for retention and disposal according to business requirements, laws, regulations, and applicable industry standards.





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Right to Know

Under the CCPA, you may exercise your “Right to Know” to request that Tellus disclose certain information we may have collected about you over the last 12 months, the categories of sources from which that information was collected, the business or commercial purpose(s) for which the information was collected, and the categories of third parties with whom we share personal information.

Right to Correct

You have the right to request the correction of inaccurate information maintained by Tellus. In many instances, such updates are best made by calling 717-317-5290, and some corrections may require specific documentation to be provided as required by law. If you provide us with documentation, it will only be used or maintained for the purpose of correcting the information and complying with our recordkeeping requirements under the CCPA.

Right to Delete

You have the right to request the deletion of personal information that Tellus has collected, subject to certain exceptions. For example, we may deny your request if retaining the information is necessary for us to complete a transaction you requested or comply with our legal obligations.

Requests

You are welcome to submit requests by calling 717-317-5290 and leaving a message providing your name and phone number.

All requests must be verified prior to receiving a response. Requesters will be asked to supply certain basic personal information to enable us to validate that the requestor is the person who is the subject of the request. Information submitted for verification purposes will only be used to verify the requestor’s identity and/or authority to make a request on another’s behalf. Requests made on another person’s behalf can only be accepted upon receipt of documentation that the requestor is an authorized agent, parent, or legal guardian of the person whose information is being requested.

Upon submission of a request, the requestor will receive an initial response confirming receipt within 10 days. A full response will be provided to the requestor within 45 days (unless an extension of up to 45 additional days is requested, upon which the requestor will receive notice and an explanation for the extension).

Non-Discrimination

The submission of a “Right to Know” or “Right to Delete” request, or exercising any of these rights, will have no impact on the service and/or pricing you receive from us. It will not result in any denial of products or services, or different prices, rates or quality of products or services, nor will it result in retaliation against an employee, applicant, or independent contractor.

Updates

This notice may be revised from time to time, so please review this Notice periodically. Any changes will become effective when we post the revised Notice on the site (please note the effective date listed at the top of this page).

Contact Us

If you have any questions or comments on this Notice or our privacy practices generally, please contact us at 717-317-5290 and leave a message providing your name and phone number.

