

**INDEPENDENT INSURANCE AGENTS AND BROKERS  
OF CALIFORNIA**

**PRIVACY NOTICE**

**I. INTRODUCTION**

As a current member or associate members of the Independent Insurance Agents and Brokers of California (IIABCal) and/or a customer of any of its subsidiaries, including the Independent Insurance Producer Service Corporation (IIPSCorp) and the Insurance Skills Center, (collectively, "Association"), we would like to take this opportunity both to thank you for your membership/business and to share with you the importance our Association places on protecting the privacy of personal non-public information we gather from you about you, your business and your individual clients, in accordance with applicable state and federal laws. We hope that this information will help inform you in meeting your own privacy obligations toward your individual clients and consumers.

The following is the Association's privacy policy regarding the personal non-public information we collect from you through our business relationship with you. Contained in this privacy notice you will find (1) an explanation of the types of personal individual information the Association collects from our members/customers in the ordinary course of business, and the means used to collect such information, (2) an explanation of how the Association uses and shares the personal information collected from our members/customers, and (3) an explanation of how the Association protects individual personal information received through members/customers.

**II. INFORMATION WE COLLECT AND THE MEANS USED TO COLLECT**

The Association only collects personal non-public information about individuals from our members/customers that is necessary to provide those services to our members/customers that is usual and customary to professional associations and independent insurance agents. The Association also collects such personal non-public information for marketing purposes, and provides de-identified, aggregated information to third parties for marketing purposes (that is, information provided to third parties does not contain personally identifying information). The Association collects this information from the following sources:

- *Personal non-public information voluntarily provided by individuals on applications or other forms.* This information may include, but is not limited to, an individual's name, address, date of birth, bank account information, and credit card information.
- *Personal non-public information about individual transactions through our members/customers* This information may include, but is not limited to, claims and payment history. In some instances, claims history may include an individual's personal health information.
- *Personal non-public information we receive from a consumer-reporting agency.* This information may include, but is not limited to, an individual's driving record.

To collect personal non-public information from the above-stated sources, the Association may use the

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following means of communication to gather information: in hard-copy, in-person, by telephone, by facsimile, electronically (such as through email), and on-line (such as through our website). In all instances, the Association collects this information pursuant to its contract or relationship with our members/customers, and not through a direct commercial relationship with an individual end-consumer.

### **III. HOW WE USE AND SHARE PERSONAL INFORMATION**

We use the information described above to service or process the Association offerings and insurance needs of our members/customers; and to better understand and serve the industry as a whole.

We share the information described above with third parties in the following circumstances, as permitted or required by law:

- Information that is necessary to service or process the insurance needs of our members/customers, in a manner that is consistent with the usual and customary services provided by independent insurance agents. Such usual and customary services or processes include but are not limited to underwriting, shopping the renewal, rating, placement, and providing quotes for insurance that is germane to the coverage the customer places with our agency.
- Information that is necessary to service or process the Association needs of our clients, in a manner that is consistent with the usual and customary services provided by independent insurance agent associations. Such usual and customary services or processes provided include but are not limited to transcription of CEU information, license renewal information, course registration information, etc.
- Information that is necessary to protect the confidentiality or security of our members'/customers' records.
- Information that is necessary to resolve member/customer disputes or inquiries.
- Information that is required by individuals or entities who are assessing our legal compliance.
- Information that is required for the Association to comply with a federal or state statute or regulation, governmental inquiry, subpoena response, court order, or other legal requirement.
- Information requested by an actuarial or research organization for the purpose of conducting actuarial or research studies.
- Information that is necessary to protect against or prevent fraud, unauthorized transactions, legal claims, or other liability.

Under no circumstances will we disclose any personal health information other than as required by law. Under no circumstances will we disclose any account numbers or similar access numbers or codes for marketing purposes.

### **IV. OUR PRACTICES REGARDING INFORMATION CONFIDENTIALITY AND SECURITY**

We maintain commercially reasonable physical, electronic, and procedural safeguards to guard your information. These safeguards include but are not limited to the following:

- We restrict access to personal non-public information to those employees who need to know that information in order to assist in providing services or products to the customer.
- We discipline any employee who impermissibly shares personal non-public information.

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- We use a secure Internet and e-mail provider to protect the confidentiality of electronic communications.

The Association appreciates your business and in order to continue building upon that relationship we believe it is necessary, not only from a legal standpoint, but also as a sound business practice, that our members/customers understand the care our Association uses in handling your information. The Association will continue to monitor the effectiveness of its privacy practices and update you if there are any material changes to those practices.