



SIRIUSPOINT LTD.

PRIVACY POLICY

EFFECTIVE DATE: February 26, 2021 (last updated November 21, 2023)

SiriusPoint Ltd. is a Bermuda-domiciled holding company whose operating companies offer reinsurance and insurance products for a rich variety of classes and serve clients and brokers throughout the world.

In this Privacy Policy ("**Policy**"), we describe how SiriusPoint Ltd. and its group companies, collectively ("**SiriusPoint**," "we," "us," or "our") collects, uses, and discloses personal information that we obtain about visitors to our website www.siriuspt.com (the "**Site**") and the services available through our Site (collectively, the "**Services**"). "Personal information" generally means any personally identifiable information relating to an identified or identifiable individual, and that is not available to the general public, or else as defined under applicable law or in a separate privacy policy or notice made available to you. This Privacy Policy constitutes our privacy notice notably for the purposes of compliance with the Personal Information and Protection Act 2016 of Bermuda ("**PIPA**"); Canada Federal Personal Information Protection and Electronic Documents Act ("**PIPEDA**"); Singapore Personal Data Protection Act of 2012; and California Consumer Privacy Act ("**CCPA**"), each as may be amended from time to time, and to the extent these laws are applicable to our collection and processing of your personal information.

By visiting the Site, or using any of our Services, you acknowledge, and if you are in Canada, Singapore or the US, you agree, that we will collect and process your personal information in accordance with this Policy, and you consent to the practices and terms set forth in our Terms of Use, available [here](#). If you do not feel comfortable with any part of this Privacy Policy or our Terms of Use, please discontinue use of the Site or Services immediately. If you are in Canada, Singapore or the US, your use of our Site or Services, and any dispute over privacy, is subject to this Policy and our Terms of Service, including its applicable limitations on damages and the resolution of disputes. You have the right to complain to the relevant privacy commissioner and have their dispute addressed by the Commissioner, though we kindly ask that you provide us with the opportunity to first address your concerns.

CONTENTS

[The Information We Collect About You](#)

[Why We Use Your Information](#)

[Sharing Your Information](#)

[Our Use of Cookies and Other Tracking Mechanisms](#)

[Links](#)

[Security of Personal Information](#)

[Access To and Correction of Personal Information](#)

[What Choices Do I Have Regarding Promotional Emails?](#)

[Integration of Third-Party Platforms and Services](#)

[Children](#)

[Contact Us](#)

[Changes to this Policy](#)

[International Transfers](#)

[Data Privacy Framework](#)

[Additional Information for Individuals in Bermuda](#)

[Additional Information for Individuals in Canada](#)

[Additional Information for Individuals in Europe and the United Kingdom](#)

[Additional Information for Residents of Singapore](#)

[Additional Information for Individuals in the United States](#)

[Additional Information for California Residents](#)

The Information We Collect About You

We collect information about you directly from you and from third parties, and automatically through your use of our Site or Services. Where required by applicable law, we will obtain your consent upon or before collecting, disclosing and otherwise using your personal information.

Information We Collect Directly From You. The information we collect from you depends on how you use our Site and Services. If you choose to contact us through the Site, we will collect your name, company address, your business contact information, and your communications with us.

Information We Collect Social Media Widgets and Platforms. Like many companies, we are active on social media platforms. We may collect information about you when you interact with us on social media platforms. For example, if you follow our social media accounts or if you message us or tag us in a social network post, we will collect information about your message or the post we are tagged in. We do not collect personal information from other publicly-available sources.

Information We Obtain From Third Parties. As part of performing our insurance-related services, including as part of validating insurance claims, we may also obtain information from unaffiliated third-party sources, such as the Department of Motor Vehicles, verified data warehouses, consumer reporting agencies, or other insurers.

Information We Collect Automatically. We automatically collect information about your use of our Site and Services through cookies, web beacons, and other technologies. The information we automatically collect includes: your domain name; your browser type and operating system; web pages you view on the Site; links you click on the Site; your IP address; the length of time you visit our Site; and the referring URL, or the webpage that led you to our Site. To the extent permitted by applicable law, we combine this information with other information we collect about you, including your personal information. Please see the section [“Cookies and Other Tracking Mechanisms”](#) below for more information.

Why We Use Your Information

We use your information, including your personal information, where we have a legitimate business interest to do so, as follows:

- *Service Provisioning/Transactional Purposes:* We use your personal information to respond to your requests. If you do not provide the requested information, we may not be able to communicate with you about your use of our Site and Services, to respond to your inquiries, provide technical support, or for other customer service purposes. We use the information that you provide to process and service insurance policies, settle claims, and otherwise fulfill requested services.
- *Personalizing our Communications:* We use your personal information to develop our business and our relationship with you, to tailor the content and information that we may send or display to you, to provide personalized help and instructions, and to otherwise personalize your experiences while visiting the Site or using the Services.
- *Marketing Communications:* With your consent where required under applicable law, we may use your information:
 - To send you marketing communications about our products and services.
 - To send you news and newsletters.
 - To send you marketing communications about products and services of our affiliated entities.

Where applicable law requires us to obtain your consent prior to sending you any marketing communications, we will do so. You may withdraw your consent easily at any time. See, [What Choices Do I Have Regarding Promotional Emails?](#) for more details about how to opt-out of marketing e-mail communications. To opt-out of other communications, see [Contact Us](#).

- *Advertising:* In accordance with applicable laws, we may use your information as follows:
 - With respect to information collected on our Sites, to assist us in determining relevant advertising content and media.
 - To evaluate the success of our advertising campaigns (including our online targeted advertising and offline promotional campaigns).

See also the Ad Networks section discussed below.

Many of these advertising activities are based on information collected by cookies and other tracking technologies. Where applicable law requires us to obtain your consent prior to setting any cookies or tracking technologies on your device, we will do so, and you can withdraw easily at any time. See our [Cookie Policy](#) for additional information.

- *Site and Product Improvement/Research:* We may use your information as follows:
 - To better understand how users access and use our Sites and Services, both on an aggregated and individualized basis. For example, we will evaluate which features of our Sites and Services are more (or least) used by users, and we will use this information to update or add new features to our Sites and Services. We may also use feedback provided by users to update our Services or develop new products and services.
 - To administer surveys and questionnaires, such as for market research or customer satisfaction purposes.
 - To create aggregated, anonymized, pseudonymized or de-identified data sets. We may use such data

sets for research, product improvement and development, marketing, advertising, trend analysis and other purposes.

- *Legal Purposes:* We strive to conduct our business in compliance with the laws of Bermuda, where we are incorporated and organized, and other applicable laws, as well as with our internal policies, in order to protect our reputation and the integrity of our business. If you do not provide requested information that is required by applicable law, we may not be able to respond to your request or perform our obligations to you. We may use your information:
 - To comply with legal obligations and act in accordance with legal authorizations, as part of our general business operations, and for other business administration purposes, including to comply with our legal and regulatory requirements, authenticating your identity, maintaining customer records, to monitor your compliance with any of your or your organization's agreements with us, to collect debts owed to us, to safeguard our business interests, and to manage or transfer our assets or liabilities, for example in the case of an acquisition, disposition, amalgamation or merger, as described below under "Sharing your Information/Business Transfers."
 - Where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of this Policy, your agreements with us, and any applicable terms of use. We will also process your personal information in accordance with this Policy to combat spam, malware, malicious activities, and security risks as part of our ongoing maintenance and enforcement of our security measures.
 - For other purposes we may inform you about from time to time. Where required by applicable laws and regulations, we will obtain your consent if we wish to use your personal information for purposes requiring such consent.

Sharing Your Information

We only disclose your personal information as permitted or required by applicable law. We may share your information, including personal information, as follows:

- **Service Providers.** We disclose the information we collect from you to service providers, contractors or agents who perform functions on our behalf. These service providers include hosting services, marketing agencies, website hosting, verification, customer relationship management, email and postal delivery, analytics, and customer support.
- **Affiliates.** We disclose the information we collect from you to our affiliates, subsidiaries, and within our corporate organization. For example, we may direct your inquiries to an affiliate who is best able to respond to your inquiry.
- **Managing Agents and Underwriters.** We work with managing agents, investigators, appraisers, attorneys, managing underwriters, and other persons in certain markets to process and/or underwrite coverage and manage claims. We may share your information and communications to us with the managing agent or managing underwriter in your location to respond to your inquiry, for relationship management purposes, and to manage your insurance policies and claims. We may also share your information with another insurance company, reinsurers, state insurance departments, financial institutions, appointed representatives, insurance-support organizations that detect and prevent fraud, or medical professionals and other institutions to verify coverage or conduct service audits.

We also use and share your personal information for the following purposes:

- **Business Transfers.** If (i) we or our affiliates are or may be acquired by, amalgamated or merged with, financed by, or are invested in by another company, or (ii) if any of our assets are or transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company or company group. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and third-party advisors, including attorneys and consultants.
- **In Response to Legal Process.** We may disclose your information to comply with the law, a judicial proceeding, court order, a law enforcement request, or other legal process, such as in response to a subpoena, search warrant or other legal or judicial requirements.
- **To Protect Us and Others.** We disclose your information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our agreement(s) with you or this Policy, or as evidence in litigation in which we are involved or may become involved.
- **With Your Consent.** We may disclose your personal information for any purpose with your consent, where required by applicable law.

Please note that we may disclose, without restriction, aggregated or anonymized information about the users of our Site or Services, which is information that does not identify any specific individual.

Our Use of Cookies and Other Tracking Mechanisms

We, our service providers, and ad networks that we work with use cookies and other tracking mechanisms to track information about your use of our Site and Services. We may combine this information with other personal information we collect from you and (our service providers may do so on our behalf). Please see our [Cookie Policy](#) for additional information. Cookies set by SiriusPoint are considered “first-party” cookies, whereas cookies set by a domain other than SiriusPoint are considered “third-party” cookies.

Cookies. Cookies are alphanumeric identifiers that we transfer to your device’s hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site and Services, while others are used to allow us to track your activities at our Site and when using Services. There are two types of cookies: session and persistent cookies.

- Session Cookies. Session cookies exist only during an online session. They disappear from your device when you close your browser or turn off your device. We use session cookies to allow our systems to uniquely identify you during a Site or Services session. This allows us to process your online activities as you move through our Site and Services.
- Persistent Cookies. Persistent cookies remain on your device after you have closed your browser or turned off your device. We use persistent cookies to track aggregate and statistical information about user activity.

We use first-party and third-party cookies for the following purposes:

- to make our Services function properly;
- to improve our Services;
- to recognize you when you return to our Services and to remember information you have already provided;
- to track your interaction with the Services;

- to collect information about your activities over time and across third party websites or other online services in order to deliver content and advertising tailored to your interests; and
- and to provide a secure browsing experience during your use of our Services.

Your Choices. Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can exercise your preferences in relation to cookies served on our Site by taking the steps outlined below.

- *First-Party Cookies.* You can use the browser with which you are viewing this Site to enable, disable or delete cookies. To do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of the Site. Also, if you disable cookies other parts of the Site may not work properly. You can find more information about how to change your browser cookie settings at <http://www.allaboutcookies.org>.
- *Third-Party Cookies.* Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain websites where people can opt out of interest-based advertising from their members. To opt-out of website interest-based advertising provided by each organization’s respective participating companies, visit the DAA’s opt-out portal available at <http://optout.aboutads.info/>, or visit the NAI’s opt-out portal available at <http://optout.networkadvertising.org/?c=1>.

We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. In addition, most web browsers provide help pages relating to setting cookie preferences. More information may be found for the following browsers here:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)

Clear GIFs, pixel tags and other technologies. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your device’s hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our Site and Services to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Site usage. We and our service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

Analytics. We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site. We also may use other analytic means to evaluate our Site and Services. We use these tools to help us improve our Site’s performance and user experiences. Our analytics providers may use cookies and other tracking technologies, such as web beacons, scripts, or local storage objects (LSOs), to perform their services. To learn

more about Google's privacy practices, please review the [Google Privacy Policy](#). You can also download the Google Analytics Opt-out Browser Add-on to prevent your personal information from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

Do-Not-Track. Currently, our systems do not recognize browser "do-not-track" requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies).

Links

Our Sites and Services may contain links to non-affiliated websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those non-affiliated websites. We are not responsible for the information practices of such non-affiliated websites.

Security of Personal Information

We have implemented appropriate administrative, technical and physical safeguards designed to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee absolute security, and the safety and security of your information also depends on you. Where you have chosen a password for access to certain parts of our Services, you are responsible for keeping this password confidential. You should not share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we strive to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Service. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services. If you believe that any of your personal information held by SiriusPoint has possibly been compromised, please contact us immediately as described in the "Contact Us" section below.

Access To and Correction of Personal Information. With respect to information that you directly provide to us, you may request that we correct/update any information for accuracy. If you wish to correct personal information provided to SiriusPoint by a third party, please contact the applicable third party. You may also request that we delete your personal information if permitted under the laws of your state of residence, although we may refuse this request if we are required to maintain the information for our record-keeping purposes or for other legitimate reasons.

What Choices Do I Have Regarding Promotional Emails?

With your consent where required by applicable law, we will send periodic promotional emails to you. You may opt-out of promotional emails by following the opt-out instructions contained in the email. We will process opt-out requests in accordance with applicable law. If you opt-out of receiving promotional emails, we may still send you emails about your account or any services (including the Services) you have requested or received from us. If you have questions or would like to make an unsubscribe request, you may also contact us as described in the "Contact Us" section below.

Integration of Third-Party Platforms and Services

The Site or Services may be linked to, rely on and be integrated with websites, applications, interfaces, services and platforms operated by other companies, including third-party services. We are not responsible for the privacy practices of such websites, applications, interfaces, services and platforms operated by third parties that are linked to, rely on and/or integrated with the Services or for the privacy practices of thirdparty advertising companies. Once you leave our Site or Services via a link, access a third-party service or click on an advertisement, you should check the applicable privacy policies to determine, among other things, how related companies process personal information they may collect about you. This Privacy Policy applies solely to information collected by SiriusPoint.

Children

Our Services are not designed for persons under the age of 18, and we do not knowingly collect any personal information directly from children under the age of 18. If we discover that someone under 18 has provided us with personal information, we will promptly delete such information from our systems.

Contact Us

If you have questions about our use of your personal information or this Policy, or if you would like to make a complaint, please contact us at Group.Compliance@siriuspt.com. Mailing address information is also available at <https://www.siriuspt.com/contact/>.

Changes to this Policy

This Policy is current as of the “Last Updated” date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Site. If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Site. Where required by applicable law, we will obtain your consent to such changes before implementing them.

International Transfers

When you access or use our Site or Services, your personal information may be processed in the United States or any other country in which SiriusPoint, its affiliates, or service providers maintain facilities. Such countries or jurisdictions may have data protection laws that are less protective than the laws of the jurisdiction in which you reside. If you do not want your information transferred to, processed, or maintained outside of the country or jurisdiction where you are located, you should immediately stop accessing or using the Site or Services.

We transfer your personal information subject to appropriate safeguards as permitted under the data protection laws, including: (i) through the use of standard contractual clauses approved by an appropriate regulatory authority, such as the European Commission or the U.K. Information Commissioner’s Office; (ii) an Article 49 derogation in specific situations; or (iii) any other compliant transfer mechanism. We may also rely on an adequacy decision of the appropriate regulatory authority confirming an adequate level of data protection in the jurisdiction of the party receiving the information.

Data Privacy Framework

The following SiriusPoint, Ltd affiliates or subsidiaries comply with the EU-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework, and Swiss-U.S. Data Privacy Framework (collectively the “DPF”),

as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, Switzerland, and the United Kingdom to the United States:

- SiriusPoint Global Solutions, LLC (“SGS”)

SGS’s accountability for personal data that it receives in the U.S. under the DPF Program and subsequently transfers to a third party is described in the Principles. SGS remains responsible and liable under the Principles if third parties that it engages to process personal data on its behalf do so in a manner inconsistent with the Principles, unless SGS proves it is not responsible for the event giving rise to the damage.

SGS has certified to the Department of Commerce that it adheres to the DPF Principles. If there is any conflict between the terms in this privacy policy and the DPF Principles, the DPF Principles shall govern. To learn more about the DPF program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

The Federal Trade Commission has jurisdiction over SGS’s compliance with DPF.

Disputes covered by DPF

In compliance with the DPF Principles, SGS commits to resolve complaints about our collection or use of your personal information. European Union, Swiss, and United Kingdom individuals with inquiries or complaints regarding our DPF policy should first contact Group.Privacy@siriuspt.com.

SGS further commits to cooperating with European Union, Swiss, and United Kingdom data protection authorities (DPAs) and complying with the advice given by such authorities, including the European Data Protection Board, the UK Information Commissioner’s Office, and/or the Swiss Federal Data Protection and Information Commissioner.

Under certain conditions, more fully described on the Data Privacy Framework website (<https://www.dataprivacyframework.gov/s/article/ANNEX-I>), you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted in accordance with Annex I of the DPF Principles.

Verification of DPF compliance

SiriusPoint America utilizes the self-assessment approach to assure its compliance with its DPF obligations and regularly verifies that this policy is accurate, comprehensive, prominently displayed, completely implemented, and in conformity with DPF.

Additional Information for individuals in Bermuda

In this section, we provide additional information to individuals in Bermuda as required under PIPA. An individual has certain rights for limiting the use of, and for accessing, rectifying, blocking, erasing and destroying, their personal information which we use in Bermuda. In general, and subject to certain limited exceptions, the options for exercising such rights are:

- Accessing – You may make a written request for access to (i) personal information about you in our custody or under our control; (ii) the purposes for which your personal information has been and is being used by us; and (iii) the names of the persons or types of persons to whom and circumstances in which your personal information has been and is being disclosed. On receipt of your request, we shall provide you with such access, unless we are entitled or required not to provide such access. In certain circumstances, the

information we provide in response to your access request may be redacted. If we are unable to comply with your access request, we will inform you of such.

- **Rectifying** – You may make a written request to us to correct an error or omission in any of your personal information which is under our control. On receipt of such request and the correct information, we shall, in most cases, update the personal information we use.
- **Blocking** – You may make a written request that we cease, or not begin, using your personal information for the purposes of advertising, marketing or public relations. On receipt of such request, we shall cease, or not begin, using the personal information for the purposes of advertising, marketing or public relations. Similarly, you may request that we cease, or not begin, using your personal information where the use of that personal information is causing or is likely to cause substantial damage or substantial distress to you or to another individual. On receipt of such request, we shall either cease, or not begin, using the personal information that you have identified in your request, or provide you with written reasons as to why the use of such personal information is justified.
- **Erasing and destroying** – You may a written request that we erase or destroy personal information about you where that personal information is no longer relevant for the purposes of its use. On receipt of such request, we shall erase or destroy the personal information that you have identified in your request, or provide you with written reasons as to why the use of such personal information is justified.

If you make a request to us in respect of your personal information which we use in Bermuda and we do not comply with your request for whatever reason, you have a right to ask the Bermuda Privacy Commissioner for a review of our decision, action or failure to act. Further, where you believe an obligation has not been performed, a right not observed or personal information used not in compliance with PIPA, then you can initiate a complaint against us with the Bermuda Privacy Commissioner, though we kindly ask that you provide us with the opportunity to first address your concerns.

Our Bermuda office is located at Point House, 3 Waterloo Lane, Pembroke HM 08, Bermuda, and if you have any questions about this Privacy Policy or for more details about your rights or how we collect, disclose and otherwise use your personal information in Bermuda, please contact our Bermuda Privacy Officer at Group.Privacy@siriuspt.com.

Additional Information for Individuals in Canada

We are a Bermuda based company with affiliates in the US and elsewhere and we use service providers outside Canada. Accordingly, your personal information will be transferred and stored outside Canada for the purposes outlined in this Privacy Policy, and will be accessible to law enforcement and/or regulatory authorities in such non-Canadian jurisdictions.

If you wish to access or correct your personal information held by us, you may contact us as set forth in the [Contact Us](#) section above.

Additional Information for individuals in Europe and the United Kingdom

[Privacy Notice for Policyholders](#)

[Privacy Notice for Business Partners](#)

[Privacy Notice for Job Applicants](#)

[Claims Philosophy](#)

[Consumer Complaints](#)

Additional Information for Residents of Singapore

In this section, we provide additional information to Singapore residents about how we handle their personal information.

Contact Us

If you are a resident in Singapore and you have any complaints or queries or wish to exercise your rights in relation to your personal information, please contact us at the following:

Email address: DPOSingapore@siriusgroup.com

Telephone number: +65 6435 0052

Your rights - Rights to access and correct your personal information; other rights

You have the right to request access to the personal information that we hold about you and to obtain information about the ways in which such personal information may have been used or disclosed by us in the year before your request. You also have the right to request that we correct any errors or omissions in your personal information.

In certain situations, you may also have a right of data portability, where you may request the transfer of your personal data which is in our possession or under our control to another organization (to the extent that this is permitted under applicable law).

We reserve the right to charge a reasonable fee where permitted by law. In the event that exercising your rights generates expenses, we will clearly state the basis for the expenses incurred.

We may ask you for additional personal information to verify your identity or for security purposes before disclosing the personal information requested to you. We also reserve the right to refuse your requests in accordance with applicable law.

We will generally respond to requests as soon as possible and in any event within thirty days. However, if a response will require more than the standard amount of time, we will inform you of the additional amount of time required to process your request.

Additional Information for individuals in the United States



Policyholder General
Privacy Notice.pdf

Additional Information for California Residents

In this section, we provide additional information to California residents about how we handle their personal

information, as required under California privacy laws including the California Consumer Privacy Act, as amended (“CCPA”). Notably, however, the CCPA does not apply to personal information collected, processed, sold or disclosed pursuant to the federal Gramm-Leach-Bliley Act (“GLBA”), and implementing regulations, or the California Financial Information Privacy Act (“FIPA”). In most cases, information processed by SiriusPoint in relation to the provision of insurance services will be outside the scope of the CCPA, but information collected via our marketing Site or prior to a customer or policyholder relationship, for instance, may be within the scope of the CCPA. This section also does not address or apply to our handling of publicly available information lawfully made available by state or federal government records or other personal information that is exempt under the CCPA.

Categories of Personal Information Under the CCPA

While our collection, use and disclosure of personal information varies based upon our relationship and interactions with you, in this section we describe, generally, how we have collected and disclosed personal information about consumers in the prior 12 months (from the Last Updated date above).

Categories and Sources of Personal Information Collected. The table below identifies, generally, the categories of personal information (as defined by the CCPA), we have collected about California residents. For more information about the business or commercial purposes for which we collect and use personal information, please see the [Why We Use Your Information](#) section above.

Categories of Personal Information	Description
Identifiers	Includes direct identifiers, such as name, email address, phone number, address and other contact information.
Usage Data	Includes browsing history, clickstream data, search history, access logs and other usage data and information regarding an individual’s interaction with our websites, and our marketing emails and online ads.
Inferences	Includes inferences drawn from other personal information that we collect to create a profile reflecting an individual’s preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities or aptitudes. For example, we may analyze personal information in order to identify the offers and information that may be most relevant to customers, so that we can better reach them with relevant offers.

Sources of Personal Information. As further described in the Information We Collect About You section above, we may collect personal information from the following sources:

- directly from the individual
- advertising networks
- data analytics providers
- social networks
- internet service providers
- operating systems and platforms

Disclosures of Personal Information. In the table below, we identify the categories of personal information we

have disclosed for a business purpose or that we have “sold” as defined by the CCPA, as well as the categories of third parties to whom we may disclose or sell such personal information. For more information about the business and commercial purposes for which we may disclose and sell (as defined under the CCPA) personal information, please see the [Sharing Your Information](#) section above.

Categories of Personal Information	Do We Disclose for a Business Purpose?	Do We Sell or Share?	Categories of Third Parties to Whom Information is Sold or Disclosed
<i>Identifiers</i>	YES	YES	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • affiliates and subsidiaries • advertising networks • data analytics providers
<i>Usage Data</i>	YES	YES	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • affiliates and subsidiaries • advertising networks • data analytics providers
<i>Inferences</i>	YES	YES	<ul style="list-style-type: none"> • service providers • advisors and agents • government entities and law enforcement • affiliates and subsidiaries • advertising networks • data analytics providers

California Residents’ Rights

CCPA Rights. In general, California residents have the following rights with respect to their personal information:

- **Do-not-sell or share (opt-out):** California residents have the right to opt-out of our “Sale” of their personal information to third parties, or the “sharing” of personal information with third parties for cross-context advertising purposes. California residents may opt out of sales of their personal information by us, by submitting a request to our privacy officer or by clicking the “Do Not Sell or Share My Personal Information” link in our website footer.
- **Right of deletion:** California residents have the right to request deletion of their personal information that we have collected about them and to have such personal information deleted (without charge), subject to certain exceptions.
- **Right to know:** with respect to the personal information we have collected about them in the prior 12 months, California residents have the right to require that we disclose the following to them (up to twice per year and

subject to certain exemptions):

- categories of personal information collected;
 - categories of sources of personal information;
 - categories of personal information about them we have disclosed for a business purpose or sold;
 - categories of third parties to whom we have sold or disclosed for a business purpose their personal information;
 - the business or commercial purposes for collecting or selling personal information; and
 - a copy of the specific pieces of personal information we have collected about them.
- Right to non-discrimination: California residents have the right not to be subject to discriminatory treatment for exercising their rights under the CCPA.

Submitting CCPA Requests. Verified California residents may submit CCPA requests to opt out of sales or sharing, requests to know (access) and requests to delete their personal information through one of the following methods:

- Via email at Group.Privacy@siriuspt.com
- By phone at 1.855.468.0156

In addition, California residents may opt out of “sales” or “shares” of their personal information by us by to opt out of “sales” via third party tags and cookies on our Sites using the opt-out tool available by clicking the “Do Not Sell or Share My Personal Information” link in our site footer, or by contacting Group.Privacy@siriuspt.com.

When you submit a request to know or a request to delete, we will take steps to verify your request by matching the information provided by you with the information we have in our records. You must complete all required fields on our [webform](#) (or otherwise provide us with this information via the above toll-free number). In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor. Authorized agents may initiate a request on behalf of another individual by contacting us at Group.Privacy@siriuspt.com; authorized agents will be required to provide proof of their authorization and we may also require that the relevant California resident directly verifies their identity and the authority of the authorized agent.

Your Privacy Rights Under California Shine the Light Law. Under California’s “Shine the Light” law (Cal. Civ. Code § 1798.83), California residents who provide us certain personal information are entitled to request and obtain from us, free of charge, information about the personal information (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year for information about any relevant third-party sharing in the prior calendar year. To submit a “Shine the Light” request, email us at Group.Privacy@siriuspt.com, and include in your request a current California address and your attestation that you are a California resident.

For more information about our privacy practices, you may contact us as set forth in the [Contact Us](#) section above.