

## **Privacy Policy**

Last updated: January 20, 2022

### **We value privacy, especially yours**

At Asurion LLC (“Asurion”, “we” or “our”), we take protecting your privacy seriously. In order for our websites, mobile applications, products, and services (collectively, “services”) to function properly, we need to collect and use some of your Personal Information. We want you to understand what Personal Information we collect and how we use it.

This Policy is incorporated as part of the Terms of Service that apply to your use of the services. When you use our services, you acknowledge that you have accepted the Terms of Service and this policy without exception. You also acknowledge that you consent to our privacy practices, including our use and disclosure of your Personal Information.

If you do not consent to the Terms of Service or this Policy, please do not use our services or provide any Personal Information.

Asurion shares your VIN number with Driveroo in order to provide the Services. Driveroo’s privacy policy is available at <https://www.driveroo.com/privacy-policy/>, please review this policy for information about Driveroo’s business practices.

This Policy contains the following sections:

- What’s covered by this Policy
- Personal Information we collect
- How we use your Personal Information
- How we share your Personal Information
- How we protect your Personal Information
- How long we keep your Personal Information
- How you are notified if the Policy changes
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### **What's covered by this Policy**

This Policy covers any Asurion-affiliated site, product, or service which links to this Policy and any collection, storage, transfer, sharing, disclosure and handling of your Personal Information when you use our services which we define below.

This Policy does not cover, and we are not responsible for, third-party websites or applications that may be linked from our services; linking to them does not imply an endorsement. We are not responsible for these websites or applications or any information they may collect. You should always review the privacy policy of any third-party website or application that collects your Personal Information.

### **Personal Information we collect**

When you use our services, we may collect the below types of Personal Information:

- Name;
- Mailing address;
- Email address;
- Cell phone number;
- Records of products or services you have purchased from us;
- Any information that you provide as part of vehicle servicing, which may be legally required;
- As part of the service process, Asurion or its affiliates may require you to provide a copy of your driver's license, passport, or other personal identification card;
- Shipping and billing information, credit card information or other preferred payment means;
- To service your vehicle, we may require you to provide the vehicle identification number ("VIN"), license plate number, odometer reading, vehicle make and model, or other vehicle specifications; and
- Responses to online, verbal or video surveys that you choose to complete.

We also draw inferences from the Personal Information we collect from you to potentially offer products or services that we believe would be a good fit for you (Note: at any time you may choose to withdraw your consent to Asurion's use or disclosure of your Personal Information for marketing and promotional purposes by contacting Asurion as outlined in **Where to turn with questions** section of this Policy).

### Services Performed at Your Home or Other Location

Please be aware that if you are receiving services at your home or other location, the service provider may be able to view any other information that you make available or visible, which may include Personal Information.

To provide on-site vehicle services, with your consent, the service provider may need to access your vehicle to perform services requested by you such as vehicle inspection, oil change, vehicle repair, etc.

If you are receiving vehicle services, the service provider may need to take photographs or videos of your vehicle for documentation purposes. Be aware that any information displayed in your vehicle or surrounding areas may be visible in the photo and to the onsite service provider(s).

### Communications

Our services may allow you to communicate via audio, text, or video with us or another individual (e.g., service provider or mechanic). While doing so, we collect the content (including any Personal Information) that you share, upload, or provide while communicating with us. We also collect Log Information (e.g., date and time of your call) generated from your use of our communications tools.

If a particular communications tool captures images (e.g., video) or enables screen sharing, please be aware that we, or any other individual who is a party to the communication, may be able to view any information that you make available or visible, which may include Personal Information. At any time, you may terminate the video or screen sharing by, for example, closing the tab in your browser or selecting a button to end the session.

### Using a Third-Party Account on our Services

If you use a third-party service (such as Google or other social media platform) to create an account, we may receive Personal Information that you allow such third-party service to share with us such as your name, e-mail address, profile picture, or other Personal Information.

### Log Information

Asurion also automatically gathers and stores certain information in our server logs about the use of Asurion's services, including the number of unique visitors, the frequency of visits, how users interact with our services, user experience preferences, and other information that may help Asurion improve the user experience, mitigate fraudulent activity, and comply with legal requirements. Such information may include Personal Information such as: IP address, Unique Device Identifier, CallerID / ANI (Automatic Number Identification) information, content of web pages, transaction with APIs (Application Program Interface), transactions with IVR (Interactive Voice Response) systems, activity and content of visitor interaction with call center representatives; application usage activity, hardware information, hardware and system settings, browser type, browser language, length of call, participant added to or exited from a call, the date and time of your request or call, or referral URL.

### Cookies, Pixel Tags, and Other Tracking Technologies

Asurion and its partners use cookies or similar technologies, such as Google Analytics, on our websites and mobile applications to analyze trends, administer the website, track users' movements around the website. Google Analytics uses third-party cookies to collect standard internet log information and visitor behavior information. The information generated by the cookie about your use of this website, including your IP address, is transmitted to Google. This information is used to evaluate visitors' use of the website and to compile website activity statistical reports for us. We do not use the statistical analytics tool to track or to link an IP address with the identity of a computer user. If you do not want any information to be collected and used by Google Analytics, you may be able to install an [opt-out](#) add-on to your web browser. You may learn more about how Google collects and uses personal information at "[How Google uses data when you use our partners' sites or apps](#)".

We also use these technologies to tailor and deliver advertising that may be more relevant or interesting to our users, and gather demographic information about our user base as a whole.

A cookie is a small data file that is managed by your web browser or other application and stored on your local system. Asurion uses session and persistent cookies to, among other things, identify your device during a particular interaction, analyze your behavior during a particular visit, and serve you advertising.

Pixel tags, also known as web beacons, help Asurion better manage user experience and content tracking. They also assist us in serving you advertising, including re-engaging you if you have searched for, viewed, and/or purchased our products or similar products. Pixel tags are tiny graphics with a unique identifier, which provide a similar function to cookies and are used to track user interaction with content provided by Asurion, an affiliate organization, or non-affiliated companies to assist us in providing, maintaining and operating our marketing. In contrast to cookies, which are stored on a user's device hard drive, pixel tags are embedded within content. The small size and transparency of pixel tags are not intended to deceive content recipients, but rather minimize distraction. You may opt out of third-party cookies or similar tracking technologies used to serve you targeted advertising based on the Personal Information (e.g., device information) in our cookie banner or, if you are a California consumer, by following the "Sale of Personal Information" instructions contained in the **Your California privacy rights** section of this Policy.

You can also elect to block all cookies from first parties (such as Asurion) and from third parties (such as entities involved in advertising) by using the cookie blocking options built into your browser software. The methods for doing so vary from browser to browser, and from version to version. You can obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <https://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/en-us/HT201265> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Please note, however, that if you do decide to block cookies or similar technologies, some parts of Asurion's websites may not function correctly.

In addition, associations in the digital advertising ecosystem provide methods for opting out of interest-based advertising (i.e., advertising that's been customized based on predictions about your interests generated from your visits to different websites). If you wish to opt out of interest-based advertising [click here](#) or if you are located in the European Union [click here](#). The Digital Advertising Alliance [click here](#) and the YourOnlineChoices page [click here](#) also provide opt-out mechanisms. Please note you will continue to receive generic ads.

## Do Not Track

Do-Not-Track is a public-private initiative, <http://www.w3.org/2011/tracking-protection/>, that has developed a technical "flag" or signal that an end-user may be able to activate within their browser software to notify websites that they do not wish to be "tracked" by third parties as defined by the initiative. The initiative, however, has not reached a consensus as to exactly what technical or other actions those parties receiving the signal should take. As a result, Do-Not-Track has not yet been standardized and most websites, including Asurion websites, do not alter their behavior or change their services when they receive a "do-not-track" flag or signal. You can, however, make decisions about your privacy and the advertisements you receive.

## Third-party data sources

Asurion may leverage external data sources in order to provide context and background on the users of its services in order to improve customer experience, mitigate fraud or malicious activity, or comply with internal company and external regulatory requirements.

## Personal Information we collect when we connect to your Wi-Fi network

In certain instances, such as services performed in areas with poor cellular reception, our service provider may need to connect to your Wi-Fi network in order to access our service records, process payments, etc. While connected, our service provider may be able to view your network settings, including network name, IP address and configurations, Wi-Fi signal strength, etc.

## **How we use your Personal Information**

Asurion may use your Personal Information to:

1. Fulfill a service to you;
2. Establish and verify your identity;
3. Handle and resolve billing disputes;
4. Monitor and maintain the performance and functionality of the service consistent with your choices;
5. Activate and maintain your account;
6. Provide technical support and click-to-chat functionality;
7. Protect and improve our services;
8. Offer updates, notices, invitations to participate in online, verbal or video surveys, and other information about applications and services available from Asurion or its affiliates as permitted by law. (Note: at any time you may choose to withdraw your consent to Asurion's use or disclosure of your Personal Information for marketing and promotional purposes by contacting Asurion as outlined in **Where to turn with questions** section of this Policy);
9. Respond to your questions, inquiries, comments and instructions;
10. To enforce the applicable Terms of Service;
11. Comply with the law and defend our rights;
12. Track and analyze de-identified data and provide such data to third parties that provide services to Asurion;
13. Protect against fraud and potential fraud;
14. Notify you of any known breach of your Personal Information; and
15. Maintain the security and integrity of Asurion's systems and services.

## Communications

Certain Asurion services may collect audio, text, or video to allow you to communicate with us. These communications enable us to make appointments, provide arrival time estimates, etc. After your communication with us ends, we will not store or review the contents of a communication if we are not a participant in the communication. If we are a participant in the communication, we may store and review the text or audio content of your communication with us according to the purposes described in this Policy. We may also review the Log Information (e.g., length of call) collected from our communication for these same purposes.

## **How we share your Personal Information**

We will not use or disclose your Personal Information to non-affiliated third parties except as disclosed in this Policy.

Asurion may transfer or license your Personal Information to:

- Non-affiliated companies to assist us in providing, maintaining and operating our services or marketing. These companies are required to comply with the principles set out in this Policy and only use such information for the purposes for which it was provided to them;
- A third-party, in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of its business or of any assets or shares of our business or a division thereof in order for you to continue to receive the same or similar products and services from the third-party. In such an event, we will provide notice of any material change to this Policy, or our Services, in the manner described in this Policy. In these circumstances, Personal Information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

Asurion may also disclose your Personal Information to:

- Comply with the law and/or legal process in which a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order, or judicial or administrative proceeding);
- Defend our rights and/or property or the rights and property of others;
- Enforce our Terms of Use and/or this Policy;
- Respond to claims that the content(s) of a communication violates the rights of another; or
- Detect, prevent or otherwise address fraud, security, or technical issues.

### **How we protect your Personal Information**

We use commercially reasonable, industry standard technical, administrative, and physical controls to protect your Personal Information, including data encryption where appropriate; however, since the internet is not a 100% secure environment, we cannot ensure the security of information during its transmission between you and us. Accordingly, you acknowledge that when you transmit such information, you do so at your own risk. We will notify you of any confirmed security breach of your Personal Information to the extent required by and in accordance with state and federal law.

### **How long we keep your Personal Information**

Asurion will retain your Personal Information as long as necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or not prohibited by applicable law.

### **How you are notified if the Policy changes**

We may change this Policy from time to time. If we do, we will post the updated Policy with the last revised date. Your continued use of our services means that you consent to the updates. You should periodically read the Policy to understand our privacy practices.

If we make material changes to this Policy, we will notify you in the website, product, service, or application or by email and seek your affirmative consent where required.

### **Communicating with you electronically**

By using our services, you agree that we can communicate with you electronically. This includes any required notifications (i.e., legal, technical, regulatory, security, or privacy) relating to your use of the services.

### **Commercial messages**

Where required, Asurion will seek your express consent to send you such messages. This consent is sought by Asurion, LLC, 648 Grassmere Park, Nashville, TN 37211. You may withdraw your consent by using the “unsubscribe” link located in the **Where to turn with questions** section of this Policy.

### **Your rights related to your Personal Information**

While we take various steps to ensure the accuracy and completeness of your Personal Information, we rely upon you to provide accurate and complete information when interacting with us.

Upon your request and as allowed or required by law and consistent with our applicable partner agreements, you may request Asurion to take the following actions with your Personal Information: (i) provide you with a copy, (ii) correct, (iii) update, or (iv) delete. To make such a request, or if you have a privacy-related complaint, please contact Asurion as provided in the **Where to turn with questions** section of this Policy.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider at <https://feedback-form.truste.com/watchdog/request>.

### **A few notes about social media**

Please be aware that any information that you submit to a social media website such as Facebook, Instagram or Twitter is done at your own risk and without any expectation of privacy. Asurion cannot control the actions of social media website users and is not responsible for any content or submissions contained on such websites. You should always review the privacy policy of any third-party website, product, service, or application.

By using any functionality that permits submissions to social media websites, you are indicating that you have reviewed the applicable privacy policy and terms of use of that website. Additionally, in the event that we offer functionality through our services that permits the posting of content on social media, please be aware that these websites may allow you to publicly post and share this content. Asurion cannot guarantee the privacy and safety of these websites and is therefore not responsible for any content you post. Use these features at your own risk.

### **Children under 13**

Our services are not directed to children under 13. We do not knowingly collect Personal Information from children under 13. If you become aware that your child is accessing the services and providing Personal Information without your consent, please contact us by using the information provided below. We will take steps to remove Personal Information from our storage systems and terminate the account if we determine that a child under 13 has accessed the services.

### **For non-U.S. residents**

We may transfer Personal Information that we collect about you outside of the country in which it was collected. If you are visiting from the European Union or other region with laws governing data collection and use that may differ from U.S. law, please note that you are transferring information about yourself, including your Personal Information, to a country and jurisdiction that does not have the same data protection laws in place as the European Union or other region. By doing so, you are consenting to the transfer of information about yourself, including your Personal Information, to the United States, as described in this Policy.

## APEC Participation

The Asurion privacy practices, described in this Policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of Personal Information transferred among participating APEC economies. More information about the APEC framework can be found [here](#).

To learn more about our APEC CBPR Certification click [here](#).

## Your California privacy rights

### California Shine the Light Law

California residents may opt-out of Asurion disclosing their Personal Information to third parties for their marketing purposes. If you are a California resident and do not want Asurion to disclose your information to third parties for their marketing purposes, please contact Asurion by any of the ways described in the **Where to turn with questions** section below and Asurion will respond within 30 days.

### California Consumer Privacy Act (CCPA)

The CCPA provides privacy protections for California consumers through the provision of certain disclosures and granting of specific rights. If you are a California consumer, the following sections provide you with these disclosures and information about your rights and how to exercise them, should you choose to do so.

#### Categories of Personal Information we collect

In the preceding 12 months, we have collected the categories of Personal Information described in the **Personal Information we collect** section of this Policy. These categories are classified under the CCPA as follows:

Personal Information under CCPA	Categories of Personal Information
Identifiers	Name, mailing address, email address, cell phone number, CallerID / ANI (Automatic Number Identification) information, vehicle information, such as vehicle identification number (VIN), vehicle license plate, vehicle make and model

<p>California Customer Records personal information categories</p>	<p>Name, mailing address, email address, cell phone number, CallerID / ANI (Automatic Number Identification) information, and financial information such as credit card number and debit card number</p>
<p>Protected classification characteristics under California or federal law</p>	<p>Demographic information including age, marital status, and sex (including gender)</p>
<p>Commercial information</p>	<p>Records of products or services you have purchased from us, responses to online, verbal or video surveys, and vehicle information, such as vehicle identification number (VIN), vehicle license plate, vehicle make and model</p>
<p>Internet or other network information</p>	<p>Information we collect when you visit our websites: IP address, unique device identifier, the content of web pages, transactions with APIs (Application Program Interface), hardware information, hardware and system settings, browser type, browser language, length of call, participant added to or exited from a call, the date and time of your request or call, referral URL, cookies, and pixel tags</p> <p>Information we collect when we access your Wi-Fi network: ISP configurations and settings, Wireless network's name, networks speed, and signal strength.</p>
<p>Sensory Information Geolocation Information</p>	<p>Audio information from customer interactions with call center representatives, photos or videos should you download and use an Asurion photography mobile application, or photos or videos of your device vehicle taken by a service provider to confirm that it was damaged and has been repaired, and audio, text, or video information from our communications.</p> <p>Information we collect when you visit our websites: IP address, unique device identifier, the content of web pages, transactions with APIs (Application Program Interface), hardware information, hardware and system settings, browser type, browser language, length of call, participant added to or exited from a call, the date and time of your request or call, referral URL, cookies, and pixel tags</p> <p>In certain instances, such as services performed in areas with poor cellular reception, our service provider may</p>

	need to connect to your Wi-Fi network in order to access our service records, process payments, etc. While connected, our service provider may be able to view your network settings, including network name, IP address and configurations, Wi-Fi signal strength, etc.
Inferences from Personal Information Sensory Information	Inferences we draw from the Personal Information we collect from you to potentially offer products or services that we believe would be a good fit for you. Audio information from customer interactions with call center representatives, photos or videos should you download and use an Asurion photography mobile application, or photos of your device vehicle taken by a service provider to confirm that it was damaged and has been repaired, and audio, text, or video information from your use of our communications tools
Inferences from Personal Information	Inferences we draw from the Personal Information we collect from you to potentially offer products or services that we believe would be a good fit for you

Categories of sources of Personal Information

We collect Personal Information from the following categories of sources:

- Directly from you;
- Partners and affiliates that assist us in providing products and services to you;
- Non-affiliated companies to assist us in providing, maintaining and operating our services or marketing; and
- Non-affiliated companies that provide us with demographic information.

Business purposes for collecting Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- Fulfill a service to you;
- Establish and verify your identity;
- Handle and resolve billing disputes;
- Monitor and maintain vehicle service records;
- Activate and maintain your account;
- Provide technical support and click-to-chat functionality;

- Protect and improve our services;
- Offer updates, notices, invitations to participate in online, verbal or video surveys, and other information about applications and services available from Asurion or its affiliates as permitted by law. (Note: at any time you may choose to withdraw your consent to Asurion's use or disclosure of your Personal Information for marketing and promotional purposes by contacting Asurion as outlined in **Where to turn with questions** section of this Policy);
- Respond to your questions, inquiries, comments and instructions;
- To enforce the applicable Terms of Service;
- Comply with the law and defend our rights;
- Track and analyze de-identified data and provide such data to third parties that provide services to Asurion;
- Protect against fraud and potential fraud;
- Notify you of any known breach of your Personal Information; and
- Maintain the security and integrity of Asurion's systems and services.

#### Disclosure of Personal Information for a business purpose

We may disclose your Personal Information to the following categories of third parties:

- Non-affiliated companies to assist us in providing, maintaining and operating our services or marketing. These companies are required to comply with the principles set out in this Policy and only use such information for the purposes for which it was provided to them; and
- A third-party, in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of its business or of any assets or shares of our business or a division thereof in order for you to continue to receive the same or similar products and services from the third-party. In such an event, we will provide notice of any material change to this Policy, or our Services, in the manner described in this Policy. In these circumstances, Personal Information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

In the preceding 12 months, we have disclosed the following categories of Personal Information to third parties for a business purpose:

- Identifiers;

- California Customer Records personal information categories;
- Protected classification characteristics under California or federal law;
- Commercial information;
- Biometric information;
- Internet or other similar network activity;
- Sensory information (i.e., audio information); and
- Inferences drawn (e.g., preferences) from Personal Information.

### Sale of your Personal Information

We do not sell any Personal Information as the term is traditionally understood. However, under the CCPA, in the preceding 12 months certain methods of advertising we have used could be considered a sale of personal information to third parties that assist us in providing, maintaining and operating our marketing. This personal information includes the following categories:

- Identifiers;
- Internet or other similar network activity; and
- Inferences from personal information.

We use this personal information to tailor and deliver advertising that may be more relevant or interesting to you, including serving targeted ads.

You may opt out of the sale of your personal information by contacting us as provided in the **Where to turn with questions** section below.

In the previous calendar year, Asurion received 218 requests to opt-out. Of these requests, Asurion fulfilled 184 and denied 34. The primary reason for denial was because the data subject failed to verify their email address.

In addition, if you visit our website, we engage in selling that may not identify you specifically, but rather the service you use. You may opt out of this type of selling by toggling off certain cookies or other similar technologies. This is done by navigating to the “Do Not Sell My Personal Information” link on our homepage, selecting “Sale of Personal Information” and toggling off “Targeting Cookies.” You may also opt out of this type of selling by blocking and deleting cookies or similar technologies in your browser. Please note, however, that if you do decide to block cookies or similar tracking technologies, some parts of our sites may not function correctly.

We do not sell the personal information of individuals under the age of 16 if we have actual knowledge of the individual's age.

### Access to and deletion of your Personal Information

- Information Request: By submitting an information request, you may ask that Asurion provide you with a copy of your Personal Information.
  - In the previous calendar year, Asurion received five (5) information requests. Of these requests, Asurion granted one (1) and denied four (4). The primary reason for denial was because the data subject failed to validate their identity.
- Deletion Request: By submitting a deletion request, you may ask that Asurion delete any of your Personal Information that we have collected about you and retained, subject to certain exceptions. These exceptions include but are not limited to the following:
  - Providing a good or service that you requested, taking actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise performing our contract with you;
  - Detecting security incidents and protecting against fraud or illegal activity;
  - Debugging products and services;
  - Enabling solely internal uses that are reasonably aligned with consumer expectations;
  - Complying with a legal obligation; and
  - Making other internal and lawful uses of your Personal Information that are compatible with the context for which you provided it.
  - In the previous calendar year, Asurion received 31 requests for deletion. Of these requests, 15 requests were not fulfilled because the subject's identity was unable to be verified. Additionally, 16 requests were denied due to data retention requirements or because the data subject was a current customer.

To make such an access or deletion request, please contact Asurion as provided in the **Where to turn with questions** section below. We will not discriminate against you for exercising any of your rights related to your Personal Information. On average, Asurion responds to requests in 2 business days.

### **Accountability and Governance**

Asurion has implemented various measures to monitor compliance with and enforce this Policy.

### **Where to turn with questions**

If you have any questions about this Policy, about our website, product or service, or want to request access to, correction, or deletion of your Personal Information, or have a privacy-related complaint, you can contact Asurion's Privacy Office [here](#).

You may also contact us at 1-844-798-7701 or:

Asurion  
Attn: Privacy Office  
c/o Office of the General Counsel  
140 11th Ave N.  
Nashville, TN 37203