

California Privacy Notice

Supplement to the AuguStar Financial Privacy Notice

We are providing this Notice pursuant to the California Consumer Privacy Act, (the “CCPA”). This Notice describes how AuguStar and its affiliates (“AuguStar” “us,” “we,” or “our”) may collect, use, share, and retain the personal information of California residents. This Notice applies only to California residents and supplements the AuguStar Financial Privacy Policy. This Notice does not cover personal information within the scope of your relationship with us as a job applicant, employee, independent contractor, director, or officer. For information about such information see our California Applicant/Employee Privacy Notice at <https://myjobs.adp.com/constellationinsurancecareers>.

Personal information we collect

We have collected the below categories of personal information in the preceding 12 months. All categories of personal information we collect are disclosed to service providers for the purposes specified below.

The specific pieces of personal information we collect about you vary depending on the nature of your interactions with us and may not include all examples listed below.

What personal information we collect	Why we disclose it to serve providers
Identifiers , such as real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, or passport number.	<ul style="list-style-type: none">• To provide and service insurance and annuity products• For underwriting, claim processing, and account management• For advertising and marketing purposes
Any Personal Information described in subdivision (e) of Section 1798.80 of the California Civil Code , such as name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	<ul style="list-style-type: none">• To provide and service insurance and annuity products• For underwriting, claim processing, and account management
Characteristics of protected classifications under California or federal law , such as age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, or genetic information (including familial genetic information).	<ul style="list-style-type: none">• To provide and service insurance and annuity products• For underwriting, claim processing, and account management• Research, auditing, or quality assurance
Commercial information , records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none">• To provide and service insurance and annuity products• For underwriting, claim processing, and account management• For advertising and marketing purposes
Internet or other electronic network activity information , such as Internet or other similar activity, like browsing history, search history, or information regarding a consumer’s interaction with an internet website application, or advertisement.	<ul style="list-style-type: none">• For website analytics and improvement• Research, auditing, or quality assurance• For advertising and marketing purposes
Geolocation data (i.e., any information that can be used to identify the physical location or movements of a device).	<ul style="list-style-type: none">• For website analytics and improvement• Research, auditing, or quality assurance
Professional or employment-related information , such as current or past job history or performance evaluations.	<ul style="list-style-type: none">• For underwriting, claim processing, and account management• Research, auditing, or quality assurance
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)), such as education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	<ul style="list-style-type: none">• To provide and service insurance and annuity products• For underwriting, claim processing, and account management• Research, auditing, or quality assurance
Inferences drawn from any other personal information (i.e., inferences drawn from any of the information identified in this chart to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes).	<ul style="list-style-type: none">• Research, auditing, or quality assurance

Purposes for collecting personal information

We may use or disclose your personal information for:

- Providing and servicing insurance and annuity products;
- Underwriting, claim processing, and account management;
- Fraud prevention and security monitoring;
- Website analytics and improvement;
- Regulatory reporting and legal compliance;
- Research, auditing, or quality assurance;
- Reviewing and improving our business practices and results; and
- Determining how to serve our customers and partners better.

Sensitive personal information is a subset of personal information. The sensitive personal information we collect, as listed above, includes government identifiers such as a Social Security number, financial information such as login or account numbers, precise geolocation data, race, religion, genetic data, health information, and sexual orientation. We may collect and disclose this sensitive personal information (1) to provide and service our products, (2) for underwriting, claim processing, and account management, and/or (3) to detect and prevent security incidents, fraud, and other deceptive or illegal activity.

Categories of sources of consumer personal information.

For each category of personal information described above, we collect that personal information from the following categories of sources:

- Directly from consumers or their agents (for example, from documents consumers submit to us in order for us to provide them with products and services);
- Indirectly from consumers or their agents (for example, through information we collect about consumers from consumer reporting agencies, health care providers, government entities, reinsurers, employees, contractors, applicants, brokers, dealers, advisors, distributors, and channel partners, and others in the course of providing services to them); and
- Directly and indirectly from activity on our websites.

Categories of recipients to whom we disclose personal information

We may disclose personal information to the following categories of recipients:

- **Affiliates.** We may disclose personal information to our affiliates for servicing, processing transactions, complying with the law, and other permitted business purposes.
- **Service providers.** We may disclose personal information to vendors, service providers, contractors or agents who perform functions on our behalf. These service providers may include financial service providers (e.g., third-party administrators, claims services, broker-dealers, insurance agents and brokers, and credit bureaus), as well as service providers that assist us in maintaining our network.
- **Other recipients.** We may disclose personal information where necessary to comply with the law, or in response to a judicial proceeding, court order, or other legal process, such as pursuant to a subpoena.

Whether your information is “sold” or “shared”

Although AuguStar does not sell or share personal information for monetary consideration, our use and disclosure of your personal information to marketing partners, affiliates, and analytics providers for marketing purposes could fall within California’s definitions of “selling” or “sharing,” also called “targeted advertising.” The chart below describes the categories of personal information we have “sold” or “shared,” the purpose of the selling or sharing, and the categories of third parties to whom we have “sold” or “shared” that information, all within the preceding 12 months:

What personal information we “sell” or “share”	Purpose of “selling” or “sharing”	Categories of third parties we share with
Identifiers. Legal name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, or passport number.	For advertising and marketing purposes	<ul style="list-style-type: none"> • Marketing and media companies • Advertising companies • Affiliates
Internet or other electronic network activity information. Internet or other similar activity: browsing history, search history, information on a Consumer’s interaction with a website, application logs, device data and registration, social media account information or advertisement.	For advertising and marketing purposes	<ul style="list-style-type: none"> • Marketing and media companies • Advertising companies
Commercial information. Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	For marketing purposes	<ul style="list-style-type: none"> • Affiliates

We do not have actual knowledge that we sell or share the personal information of individuals under 16 years of age. As stated above, we may disclose your personal information to other parties to obtain their analytics services and serve ads targeted to your interests and based on your online activities. These parties may use the information for their own marketing and to offer products and services. Your personal information is not shared for monetary consideration, but our use and disclosure of your identifiers and internet or other electronic network activity information to marketing partners and analytics providers for marketing purposes within the last 12 months could fall within some states' definitions of "selling" or "sharing," also called "targeted advertising."

While we recommend that you leave digital tracking technologies turned on to take advantage of our websites' many features, you have choices. For example, you can configure your browser settings to: (i) receive notifications when you are receiving new cookies; (ii) disable cookies; or (iii) delete cookies. Please refer to your Web browser's help section for information on how to do this. You can read more about targeted advertising and take steps to control targeted advertising from many ad networks and exchanges by visiting www.optout.aboutads.info and <http://optout.networkadvertising.org>.

If you block, delete, or choose not to enable digital tracking technologies, essential cookies will still function, but you might not be able to use all of the features and functionality of our websites. Please note that our systems currently don't respond to "Do Not Track" signals. Additionally, other parties may collect personal information about your online activities over time and across different web sites when you use our website.

To exercise your right to opt-out of targeted advertising and disclosures to our affiliates, see this Notice's section 7.4.

Data retention

The retention period for each category of personal information varies depending on the type of business record in which it is maintained. The criteria used to determine the retention period for the personal information category is set based on the length of time AuguStar needs the record for: (1) its original purpose; (2) other operational purposes, such as audits and reporting; (3) statutory and regulatory requirements for retention; (4) best industry practices; and/or (5) legal compliance, including legal defense and legal holds.

Your rights under California law

California residents have the following rights:

Right to know/access

You may request:

- The categories and specific pieces of personal information we have collected about you;
- The categories of sources from which your personal information was collected;
- Business or commercial purposes for the collection or disclosure; and
- Categories of third parties to whom we disclose personal information

Right to correction

You may request that we correct inaccurate personal information we maintain about you.

Right to delete

Subject to legal exceptions (e.g., regulatory retention requirements), you may request deletion of your personal information.

Right to opt out of selling or sharing

As stated above, AuguStar does not sell or share personal information for monetary consideration, but our disclosure of your personal information for targeted advertising and analytics purposes, as well as information-sharing among our affiliates, could fall within California's definitions of "selling" or "sharing." To opt-out of these disclosures, please call us at (800) 366-6654, use the online submission form at <https://augustarfinancial.com/footer/privacy-policies-and-practices>, or write to us at AuguStar Financial, Attention: Legal, P.O. Box 237, Cincinnati, OH 45201-0237.

Right to limit use and disclosure of sensitive personal information

We only use and disclose sensitive personal information as required to provide services, to meet regulatory obligations, or as permitted by the CCPA. We do not use or disclose sensitive personal information for purposes other than those specified in section 7027(m) of the CCPA.

Right to opt out of automated decision making technology (ADMT)

If AuguStar uses ADMT for underwriting, fraud detection, risk scoring, or claims assessment, we will, to the extent required:

- Provide pre use notice;
- Offer an opt out if required;
- Ensure access to meaningful human review; and
- Provide explanations regarding how decisions were made.

Right to non discrimination

We will not retaliate against you for exercising your California privacy rights.

Questions, Concerns, or to submit a verifiable consumer request

California residents may contact us with questions or concerns regarding our privacy policies and information practices, or to submit consumer requests. To do so, please contact or visit us at:

Phone: 800.366.6654

Website: augustarfinancial.com/privacy

Mail: AuguStar Financial

Attn: Legal

P.O. Box 237

Cincinnati, OH 45201-0237

We will verify your identity based on information we maintain, including your address, date of birth and policy or contract number, if applicable. Authorized agents may submit requests on your behalf, consistent with CCPA verification requirements.

Updates to this notice

In the event we update this Notice, we will post updated language on our websites and include the date of the last update. Where updates are material, we will notify you in accordance with applicable law. You may check our website for the most recent updates to this Notice at any time. This Notice is effective as of the date it was last update.