Privacy

Welcome to American Teachers. When you use our Site, you trust us with your information. This privacy policy is meant to help you understand what data we collect, why we collect it, and what we do with it. This is important, and we hope you will take time to read it carefully.

Definitions

"American Teachers" or "us" or "our" or "we" refers to American Teachers Inc. and each of its subsidiaries and affiliates. "Site" means www.sanmateoins.com and any other Internet sites operated by us, our online services, mobile services, and software. "You" and "your" means the user of this Site. "Personal information" refers to information that can be used on its own or with other information to identify, contact or locate you. For example, personal information includes your name, email address, phone number, date of birth, address, social security number, driver's license number, credit card number, or other data which can be reasonably linked to you.

Information We Collect

We collect information to provide better services to all of our users, and we collect that information in the following ways:

Information You Give Us

We collect personal information from you when you register for a American Teachers account and apply for insurance products and services through our Site. For example, when you register for a American Teachers account, we'll ask you for your name and e-mail address, and when you apply for insurance products and services, we'll ask you for your date of birth, social security number, address, phone number, driver's license number, employment, financial, family and housing information, existing life and health insurance coverage information, activity information, health information, bank account and/or credit card information, and other information. We may also collect information from you during your use of our Site, or when we communicate with you via telephone, e-mail or other means.

Information We Collect from Third Parties

When you register for a American Teachers account and/or apply for the insurance products and services offered through our Site, we will collect information from third parties to, among other things, verify your identity; assist in the underwriting of your application; make eligibility, risk rating, policy issuance and enrollment determinations; obtain reinsurance; administer coverage; administer claims; protect against fraud; and conduct other legally permissible activities. We generally collect your identifying information (for example, your name, address, e-mail, telephone number, date of birth, social security number, and employment information), bank account information, financial information, health information, driving record, criminal history, activity information, and other personal information from these third parties.

In addition, if another company refers you to us, we may collect your information from that company in order to process your application for the insurance products and services offered through our Site.

We use Acuity Scheduling to gather data about you from your financial institutions and to process ACH payments. You agree that by using our Site, services and products, you are granting us and Acuity Scheduling the right, power, and authority to act on your behalf to access and transmit your personal and financial information from your financial institution. You also agree that your personal and financial information will be transferred, stored, and processed by Acuity Scheduling in accordance with the Acuity Scheduling Privacy Policy.

Information We Collect Based on Your Activity on Our Site

In order to provide our services to you, improve our products and services, and maintain records required by law, we collect information about your transactions and activity. For example, we collect information about your computer and your visits to the Site, such as your IP address, geographical location, browser type, referral source, length of visit, button clicks, mouse movement and page views. In addition, we collect device-specific information such as hardware model, operating system version, unique device identifiers, and mobile network information including phone number. If you are a American Teachers™ policyholder, we collect information about your payment history.

We and our marketing partners and service providers use technologies such as cookies, beacons, tags, and scripts, to analyze trends, administer our Site, track users' movements around our Site, and gather demographic information about our user base as a whole. We may receive reports on this activity on an individual and aggregated basis. We use cookies when you sign in to your American Teachers account to keep track of your personal session, help authenticate your account, and detect fraud. Cookies are also used to gather statistical data, such as which pages are frequently visited, what is downloaded, and the address of sites visited immediately before or after coming to our Site. You can control the use of cookies within your web browser. However, if you reject cookies, your ability to use

some features or areas of our Site may be limited. To learn more about cookies, beacons and similar technologies, and how you may opt-out of some of this tracking, you may wish to visit http://www.allaboutcookies.org/ or the Network Advertising Initiative's online resources, at http://www.networkadvertising.org/.

We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML5). Various browsers may offer their own management tools for removing browser web storage.

We also partner with third parties to manage our advertising on other websites and evaluate the overall performance of our Site. Our third party partners may use technologies such as cookies to gather information about your activities on our Site and other sites in order to provide you advertising based upon your browsing activities and interests or help us track the success of our marketing efforts or overall Site performance. If you do not wish to have this information used for the purpose of serving you interest-based ads, you may opt-out of certain advertising networks by clicking here. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Although we do our best to honor the privacy preferences of our users, because we believe that there is a consistent industry standard for how to respond to Do Not Track browser settings, we are not able to process or respond to such signals from your browser at this time.

Purposes for Which We Use Information We Collect

We use the information we collect for our business purposes to provide, maintain, protect and improve our Site, products and services; to develop new products and services; to better our marketing efforts; and to protect us and our users. This may include processing your application for life insurance; servicing your American Teachers™ policy; enabling automatic payments and funds transfers with financial institutions; communicating with you concerning your American Teachers account and transactions; and addressing any disputes you may raise concerning your American Teachers account or the products and services offered through our Site.

We may also use your personal information to select you for certain marketing offers, newsletters, surveys and/or requests for feedback regarding your experience. We may use your personal information both to select you for an offer and to communicate that offer to you. Receipt of these communications is voluntary. If you do not wish to receive these communications please click on the "unsubscribe link" provided in such communications or reply "STOP".

How We Share and Categories of Third Parties With Which We Share Information

We do not share your information with companies, organizations and individuals outside of American Teachers unless one of the following circumstances applies:

With Your Consent

We will share your information with companies, organizations or individuals outside of American Teachers when we have your consent to do so.

As Necessary to Provide You the Products and Services You Request

We will share your information with life insurance companies, reinsurance companies and their respective administrators, vendors, agents, and third party service providers, including but not limited to insurance support organizations, that are engaged in services related to underwriting and issuing life insurance policies as needed to provide you the insurance products and services you request.

We will also share your information with third-party vendors, agents and other service providers that perform services on our behalf, as needed to carry out their work for us, which may include billing, payments, background check services, service fulfillment, web hosting or providing analytic services. We provide only as much information as is needed for these third-party vendors, agents and other service providers to perform services on our behalf.

In addition, if you were referred to us by another company, we will share your information with that company as necessary to honor the terms of our agreement with that company and to provide you the insurance products and services you request.

For Legal Reasons

We may share your information with companies, organizations or individuals as required by law or subpoena or if we reasonably believe that such action is necessary to (i) comply with, any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms, detect, prevent or address fraud, or to protect the security or integrity of our Site and the products and services offered through our Site; and/or (iii) exercise or protect the rights, property, or personal safety of us, our users or others.

In Connection with Our Sale or Other Significant Transaction

We may share your information with companies, organizations or individuals in connection with a significant transaction, such as a merger, sale of our assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of a bankruptcy or related or similar proceedings.

With Our Affiliates

We may share your information with other companies owned by or under common ownership as American Teachers. These companies will use your personal information in the same way as we can under this policy.

We Have De-Identified the Data

We may also aggregate, de-identify, or otherwise strip data of all personally identifying characteristics and may share that aggregated and/or de-identified data with other companies, organizations or individuals.

Your Choices About Your Information

If you do not want to receive promotional emails from us, you may stop receiving such emails by clicking on the "unsubscribe link" provided in such emails or reply "STOP". We make every effort to promptly process all unsubscribe requests. You may not, however, opt out of service-related emails and communications (for example, you may not opt out of emails related to account verification, changes/updates to features of our Site or products or services, technical and security notices or that provide other transactional information).

We will retain your information for as long as your account is active or as needed for legitimate business or legal purposes. We may also reject requests related to updating or deleting information that are unreasonably repetitive, require disproportionate technical effort (for example, fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for example, requests concerning information residing on backup systems). If you have any questions about reviewing, modifying or deleting your information, you may contact us by e-mail through our <u>Contact Us</u> page.

Privacy Information for California Residents

If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use, and share your "personal information" (as defined in the California Consumer Privacy Act ("CCPA")). However, please note that any information you have provided to us in connection with obtaining and/or being a customer in connection with our financial products and services (e.g., our insurance services) is already protected by certain federal financial, and federal and California state health privacy laws and is therefore not subject to the CCPA. Because of this, in this section of our privacy policy we provide disclosures and information for California residents regarding the limited personal information we collect that is subject to the CCPA.

Categories of personal information we collect

Under the CCPA, we are required to provide you with the "categories" of personal information we collect as defined by California law. The categories of personal information we collect that are subject to the CCPA are:

- Identifiers (such as name, address, email address) that are collected from prospective users or non-registered users seeking additional information about Ladder; and
- Internet or other network or device activity (such as browsing history or usage information and associated device IDs and IP addresses).

How we source, use, and share these categories of personal information

We source, use and share with third parties the categories of personal information we collect from and about you consistent with the various business and operational purposes we discuss throughout this privacy policy and for the business and operational purposes of our service providers in accordance with the CCPA. See the "Information We Collect And their Sources," "Purposes for Which We Use Information We Collect" and "How We Share and Categories of Third Parties with Whom We Share Information" section(s) above for more information.

Please note that the CCPA sets forth certain obligations for businesses that "sell" personal information to third parties. We do not engage in such activity and have not engaged in such activity in the past twelve months from the effective date of this privacy policy.

<u>CCPA Rights Disclosure</u>. If you are a California resident, the CCPA allows you (or an authorized agent acting on your behalf) to make certain requests related to your personal information that is subject to the CCPA. Specifically, the CCPA allows you to request us to:

- Inform you about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting your personal information; and the categories of third parties with whom we share/disclose personal information. Such information is also set forth in this privacy policy.
- Provide access to and/or a copy of certain personal information we hold about you.
- Delete certain personal information we have about you.
- Provide you with information about the financial incentives that we offer to you, if any.

The CCPA further provides you with the right to not be discriminated against (as provided for in applicable law) for exercising your rights. Please note that certain information may be exempt from such requests under California law. For example, we need certain information in order to provide the Services to you.

We also will take reasonable steps to verify your identity before responding to a request. In doing so, we will need to, at a minimum, match two or more pieces of information provided by you with the information maintained by us. If we are unable to verify your identity, we shall have the right, but not the obligation, to request additional information from you.

If you would like further information regarding your legal rights under California law or would like to exercise any of them, or if you are an authorized agent making a request on a user's behalf, please use the form here or by email.

Shine the Light Disclosure. The California "Shine the Light" law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

Information Security

We maintain commercially reasonable administrative, physical, and technical safeguards designed to prevent any unauthorized use, access, processing, destruction, loss, alteration, or disclosure of the data and information you provide us. In the event that any data or information under our control is compromised as a result of a breach of security, we will investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

Children's Privacy

We do not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register for a American Teachers account. In the event that we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from a child under age 13, please contact us by e-mail.

Third-Party Practices

This Site contains links to, and uses services from, other Internet sites that are not maintained by us. Unless otherwise stated, we make no warranties or representations regarding these websites or the products or services offered on them. We do not control the privacy or security practices of third parties, or the locations where they process data. You should read the privacy and security policies of the other sites, as their practices may differ from ours. In particular, we use certain Google Maps APIs to streamline the application process. The Google Maps APIs are covered by Google's Privacy Policy, and to the extent applicable, is incorporated by reference to this policy.

Contacting Us

If you have any questions regarding this privacy policy or our practices, please contact us by e-mail or through our American Teachers website.

Changes

Any changes to this policy become effective when posted to the Site. If you have registered for an account through the Site, we will notify you of any material changes to this policy by using any of the contact information you have provided to us or by posting a message on the Site's home page. In addition, we will update the "last modified" date at the bottom of this page. Your continued use of the Site or our products and services following the update means that you accept our updated policy.

This privacy policy was last modified on April 2, 2020.