

## PRIVACY POLICY

Oferta, Inc. DBA AccuSure, A California Corporation (“AccuSure”) has created this Privacy Policy (“Privacy Policy”) in order to disclose our information gathering and dissemination practices for the AccuSure website, located at **www.AccuSure.com** (“Web Site”). AccuSure will not sell or share any personal information about you to or with any person or organization except as provided in this Privacy Policy.

AccuSure is not an insurance agency and does not provide quotes directly to consumers. AccuSure offers a platform where local and national insurance agents, who register with AccuSure, on behalf of themselves or their insurance companies (“Agents”) are given access to the information business owners provide in a request for insurance (“RFI”) to generate and evaluate a business’s insurance needs and contact the business owner with an insurance quote and details or to ask additional questions. We understand that you, as Agents, business representatives may provide certain non-public information to help business representatives connect with Agent who desire to meet your insurance needs.

### Information We Collect

For each visitor to our Web Site, our server may automatically recognize the user’s domain name and other information. We do not require anyone to provide us with personally identifiable information to view the Web Site.

#### *Personally Identifiable Information*

You may, in the course of using our Web Site, choose to provide us with personally identifiable information about yourself or your company. We collect the following personal information in our RFIs and pass this information to prospective Agents so that they can generate quotes for you.

The personal information that we may collect includes, but is not limited to, the following items: first, middle and last name, full legal name and state of organization of any entity applicant; address; email address; telephone number; fax number; date of birth; social security or employer identification number; gender; and occupation.

Additional information which we may collect about your business includes, but is not limited to, the following information: number of full and part time employees, number of vehicles owned, driving records, approximate annual sales and annual payroll, type of business, loss history, information about your current insurance carrier, information regarding the number of outstanding shares or membership units, the number of shareholders or members and how such shares or membership units are held, federal employer identification number; financial information about the business, information related to litigation, personal information about employees, and information about business property.

This information will allow us to process your RFI. Except as otherwise provided in this Privacy Policy, AccuSure will store all information provided by you in its data servers for a period of at least three (3) years.

### IMPORTANT: NOTICE OF CONSUMER REPORT PRACTICES:

All proposed named insureds listed on RFIs must be made aware of the following:

In some cases, Agents may need to obtain additional background information about you. For example, consumer reports (including credit reports) may be ordered in connection with your RFI. These reports provide information that may assist in determining your eligibility for insurance and the price you may be charged. Consumer reports may also be used for updates, renewals or extensions of insurance. Agents may also obtain and use a credit-based insurance score based on information contained in your credit report.

Agents may use a third party in connection with the development of your insurance score and rate quote. By providing the information described above in this Privacy Policy through the Web Site, you are giving your express consent to Agents to obtain and use such information for the purposes set forth in this Privacy Policy.

Additionally, we may collect financial information such as credit card, checking account, or other financial institution account information from Agents, which will only be used for the purpose the information is given (a particular purchase) and will not be shared except as necessary to complete such use (i.e., banks, fulfillment houses).

AccuSure does not knowingly collect any personal information from children under the age of 18. If AccuSure obtains actual knowledge that it has collected such information, that information will be immediately destroyed and/or deleted from our databases.

#### *Cookies & Technical Information*

We also collect information automatically through the use of electronic tools. We may log the name of your Internet Service Provider, IP address, or use “cookie” technology to store a visitor’s preferences and record session information. As we adopt additional technology, we may also gather information through other means. In certain cases, you can choose not to provide us with information by setting your browser to refuse to accept cookies, but be aware that doing so may limit your ability to access certain portions of the Web Site.

Additionally, AccuSure may use log files to track how the Web Site is being accessed and used. Log files track anonymous user information such as IP addresses, browser types, Internet service providers, referring and exit pages, platform type, date and time stamps, and number of clicks to, from, and within the Web Site. We may use clear GIF Tracking Pixels to track user movement through our Web Site for aggregated Web Site traffic measuring. Finally, if you arrive at the Web Site through a referral device such as a banner ad, AccuSure may track how you arrived at the Web Site, including any clicks that might have impacted our servers.

#### *Information collected from Agents*

If you are an Agent, in addition to the provisions of this Privacy Policy that are generally applicable to all of our users, your use of this Web Site is also governed by any written agreement between you and AccuSure. We use the information shared with us by our Agents to help match Agents with a potential customer who is interested in learning more about such Agent’s insurance products or services. We may also request additional information from our Agents to create an account, including information regarding applicable insurance licenses and method of payment.

#### Use of Information

When you voluntarily submit personal information such as your name, email address, or phone number to the Web Site, please understand that by providing such information, you are giving your express consent for AccuSure and the Agents to contact you through electronic means, mail, wireless communications, facsimile, or via telephone (even if your telephone number is registered on a “Do Not Call” registry). Such consent remains fully intact until AccuSure receives written request by you to rescind such consent. Please refer to the “Opt-Out” section in this Privacy Policy.

We use personally identifiable information for various purposes, including to match you with Agents. The information from your RFI may be transmitted to one or more of our Agents. AccuSure reserves the right to disclose, transfer, or sell your personal information to Agents and other companies who are affiliated with AccuSure in AccuSure’s sole discretion.

We sometimes share personal information given to us with third parties. For instance, there may be third party service providers for our operations or business activities, with whom we have an agreement for services who transmit, store, analyze or otherwise use such information in connection with their services to us. For example, we may partner with a third party, such as a credit card processing company. Additionally, from time to time, we may use personal information for new, unanticipated uses not previously disclosed in our Privacy Policy. If our information practices change at some time in the future we will only use data collected from the time of the policy change forward for these new purposes. Further, we use the technical information collected from cookies and the other sources described above to study how the Web Site is being used and to improve the Web Site. We can also use cookies to track your preferences so that when you return to our Web Site, you can navigate more easily without having to re-enter certain information.

We also collect personal information as we deem may be reasonably necessary for tracking/verifying compliance with federal, state and local laws. We may disclose your information in response to a court order, when we reasonably believe we are required to do so by law and/or whenever we deem it appropriate or necessary to give such information to law enforcement authorities. Additionally, we reserve the right to transfer personal information to a successor in interest that acquires rights to the information as a result of the sale of AccuSure. Please note that we will not provide you with notice prior to disclosure in such cases.

### Communications

By submitting an RFI or providing other contact information you agree that AccuSure may communicate with you via newsletters, surveys, follow-up telephone inquiries, telephone solicitations, direct mail solicitations, wireless solicitations, and facsimile solicitations and courtesy communications. After you submit an RFI, you may expect to receive a confirmation email from AccuSure. Additionally, after submitting an RFI, Agents will contact you using the contact information that you provided in the RFI. In order stop these communications, you must contact the Agents directly and request that they stop contacting you. AccuSure expressly disclaims all responsibility and liability for the information collection or privacy practices of Agents.

### Opt-Out

If you do not want to receive communication from AccuSure through electronic means, mail, wireless communications, facsimile or via telephone in the future, please let us know by sending us an email or writing to us at the address listed at the end of this Privacy Policy. In order to ensure timely removal of your consent to being contacted by AccuSure, please provide all information that was originally provided to us by you and allow approximately three (3) business days to process such request.

Please understand that your election to opt-out is only effective with respect to the future delivery of communications sent directly from AccuSure. You may still receive solicitations from Agents and other third parties and the personal information that you provided may still be shared with such Agents and third parties. If you wish to stop receiving communications from any such source, you will need to contact each Agent or third party to unsubscribe from their individual mailing and contact lists, as each Agent or third party maintains its own separate databases. If, in the future, we decide to use personal information for uses not previously disclosed in our Privacy Policy, customers may prevent their personal information from being used for purposes other than those for which it was originally collected by sending us an email or writing to us at the address listed at the end of this Privacy Policy.

### Third Party Advertisers and Links

During your use of our Web Site you may link to, or view as part of a frame on our page, certain content that is created or hosted by a third party. Third parties, including our partners, advertisers, affiliates and other content providers accessible through our Web Site, may have their own privacy and data collection policies

and practices. We are not responsible for the actions, privacy, security or content of such third parties. If you are asked to provide information on one of these web sites, we encourage you carefully to review their privacy policy before sharing your information.

#### Security

When we transfer and receive certain types of sensitive information such as financial information, we redirect visitors to a secure server. We have taken reasonable precautions to maintain the security and accuracy of personally identifiable information we collect including limiting the number of people who have physical access to our database servers, as well as employing electronic security systems and password protections that guard against unauthorized access. We cannot guarantee the security of any information you disclose online and you do so at your own risk.

#### Changing or Deleting Information

We provide Web Site visitors with access to, and the ability to update and/or correct, all information that we maintain about them such as communications that the user has directed to our Web Site (e.g., emails, inquiries), or contact information (e.g., name, address, phone number) that is contained in their user profile, by sending us an email or writing to us at the address listed below. Please note that while we are able to update or delete any information that we maintain about you, this does not necessarily mean that information that you provided in an RFI or otherwise that has already been shared with Agents, may at the same time be updated or deleted by such Agents. We recommend that you review all information submitted in an RFI carefully and that you communicate any changes directly to any Agents with whom you were matched.

#### Privacy Policy Changes

Please be aware we reserve the right at our discretion to make changes to this Privacy Policy at any time, and all such changes shall be immediately applicable. When we make changes, we will revise the “Effective Date” of this Privacy Policy. Your continued use of our Web Site following the posting of changes to this Privacy Policy will mean you accept those changes. We encourage you to review the Privacy Policy each time you visit the Web Site.

#### Acknowledgement

By completing a profile, the RFI and other forms on the Web Site or by providing personal information through the Web Site, you hereby represent, warrant and agree that: (a) you have read, understand and agree to this Privacy Policy; (b) AccuSure may (i) contact you using the information you provide, and (ii) provide the information you submit to Agents and other third parties for the purposes of providing you information and quotes about insurance; and (c) that such Agents and third parties may contact you via the contact information that you provide and gather additional information about you, as described in this Privacy Policy.

#### Contact Us

If you feel that we are not complying with our Privacy Policy or if you have any questions about this Privacy Policy, you may contact us via email at [Relations@AccuSure.com](mailto:Relations@AccuSure.com).

Effective Date: April 1, 2014