

INSURANCE OFFICE OF AMERICA, INC.

Website Privacy Policy

1. Summary

1.1. Insurance Office of America, Inc. and its related companies (“IOA”) provide insurance brokerage, risk management, employee benefits, and related services to clients. IOA is committed to protecting your privacy and the confidentiality of your personal information. “Personal Information” is information that directly identifies or reasonably can be used to identify an individual user of this website (“Site”). Examples include name, address, telephone number, e-mail address, Social Security number, and financial account number.

1.2. All personally identifiable information collected on this Site by IOA is considered Personal Information and will be treated in accordance with this Website Privacy Policy.

1.3. By using this Site and submitting your Personal Information, you agree with and consent to the processing, transfer, usage, and storage of your Personal Information in accordance with this Website Privacy Policy.

2. Privacy Policy Effective Date and Updates

2.1. This Website Privacy Policy was last updated on September 17, 2014 and is effective as of that date.

2.2. IOA reserves the right to make changes to this Website Privacy Policy at any time. You are encouraged to periodically review this Site, and Website Privacy Policy for any updates or changes. IOA will advise users of this Site of material changes to the Website Privacy Policy by posting a prominent notice on the homepage advising that the policy has been revised. Your continued access or use of this Site shall be deemed your acceptance of all terms and conditions contained in this Website Privacy Policy.

3. Protection of Personal Information

3.1. IOA is committed to protecting the privacy of Internet users who visit this Site. IOA’s intent is to use and if appropriate to disclose your Personal Information in a manner consistent with applicable laws and regulations, contractual obligations, and IOA’s policies and procedures. IOA protects Personal Information collected about you by maintaining physical, electronic, and procedural safeguards designed to meet or exceed applicable laws.

3.2. To safeguard Personal Information, the electronic storage and transmission of Personal Information is secured with appropriate security technologies. Access to this Site’s servers is limited to employees, agents, and contractors of IOA and its subsidiaries, all of whom are required to preserve the confidentiality of Personal Information they receive while performing their jobs and conducting the business of IOA.

4. Information Collected

4.1. IOA collects two types of information about you when you visit the Site: Personal Information that you provide (including, by way of example, your name and e-mail address) and non-personal aggregate information such as cookies with information regarding the pages on this Site that you have visited and your IP address.

4.2. A cookie is a small file, typically of letters and numbers, downloaded onto a device when the user accesses certain websites. Cookies allow a website to recognize a user’s device. The user’s web browser stores this information on disk in the form of a small data file.

4.3. When using this Site, you may decide to provide us with Personal Information to help us serve your needs. For example, you may choose to give us your name, e-mail address, and company information in order to receive e-mails from IOA concerning company news, compliance issues, and services provided, or in order to contact IOA to make an inquiry concerning services provided, career opportunities, or other inquiries. You may choose to submit an employment application for a position at IOA through this Site. In addition, you may decide to complete an online form that requests Personal Information or otherwise enter Personal Information into the Site for the purpose of obtaining an insurance policy quote. In addition, if you contact us, we may keep a record of that correspondence.

4.4 IOA does not intentionally collect information from children under the age of 13. This site does not target children.

5. Personal Information – Use and Disclosure

5.1. IOA will not exchange, sell, or otherwise distribute your Personal Information without your consent, except to the extent required by law, in accordance with your instructions, or as identified in this Website Privacy Policy. Further, IOA has procedures designed to ensure that Personal Information that needs to be transferred for any of these purposes is transferred only to third parties that follow adequate data protection principles. By using this Site and submitting Personal Information to this Site, you consent to the collection, usage, storage, transfer, and disposition of your Personal Information—as set forth in this Website Privacy Policy—for all purposes set forth in this Policy, for all purposes required by law, and as instructed by you. If you do not consent, do not provide any Personal Information via this Site.

5.1.1. Disclosure within IOA Family of Companies. We may share your Personal Information with companies within the IOA family of companies. We

may use such information to ensure that the content from our Site is presented in the most effective manner for you and your computer; to provide you with information, products, or services that you request from us or which IOA feels may interest you (where you have consented to be contacted for such purposes); to carry out any obligations arising from any contracts entered into between you and IOA; to allow you to participate in interactive features of our service if you choose to do so; and to notify you about changes to our service. By submitting Personal Information through this Site, you consent the transfer to and the processing and usage of your Personal Information within the IOA family of companies. If you do not consent, do not provide any Personal Information through this Site.

5.1.2. Disclosure to Third-Party Agents and Service Providers. We sometimes contract with other companies and individuals to perform functions or services on our behalf. For example, IOA sometimes contracts with entities that host websites; entities that receive employment applications; and entities that send e-mail messages or make phone calls on our behalf. They may have access to Personal Information such as names, e-mail addresses, and telephone numbers needed to perform their functions. However, they are restricted from using such Personal Information for purposes other than providing services for IOA and are required by IOA to maintain the confidentiality of such Personal Information. By submitting Personal Information through this Site, you consent to the transfer to and the processing and usage of your Personal Information by IOA's agents and service providers. If you do not consent, do not provide any Personal Information via this Site.

5.1.3. Disclosure of Tracking Information to Certain Third Party Service Providers. Third parties who provide interactive plug-ins or social networking features such as but not limited to Facebook's "Like" button, or sent e-mail messages on our behalf to individuals who are listed in their databases, may use cookies or other methods to track the activity on this Site. Such third parties may use these cookies or other tracking methods for their own purposes by relating information about your visit to our website with any of your personally identifying information that they may have. By browsing this Site, you consent to the transfer to and the processing and usage of your Personal Information by such third parties as set forth in this paragraph. If you do not consent, please disable these cookies in your browser or refrain from browsing our Site.

5.1.4. Disclosure to Insurance Companies and Intermediaries. In the event you request a quote for issuance of an insurance policy or seek to purchase insurance through the Site, we may share your Personal Information, including, but not limited to, medical, financial, drivers' license, and/or other Personal Information you choose to provide with insurance companies or intermediaries for purposes of obtaining quotes and placing insurance on your behalf. By

submitting your Personal Information via this Site, you consent to the transfer to and the processing and usage of Personal Information, including any sensitive Personal Information you provide to insurance companies or intermediaries. If you do not consent, do not provide Personal Information for purposes of purchasing insurance or obtaining quotes for insurance via this Site.

5.1.5. Disclosure of Résumés and Applications to Third-Party Vendors during the Recruitment and Employment Processes. This Site provides an opportunity to submit inquiries regarding career opportunities and to submit your résumé and an application form to us to apply for a position through this Site. If you submit information for such purposes, we will use the Personal Information you provide to evaluate your qualifications and contact you regarding any positions at IOA or any of its affiliated companies in which we believe you may be interested. All applications and other information submitted via this Site will be collected and processed through a third-party vendor. If you are outside of the United States and choose to submit an application or a résumé via this Site, information you submit for employment purposes may be transferred to IOA or third parties located in the United States or other countries not deemed to ensure adequate levels of data protection. By submitting Personal Information for employment purposes, you consent to the processing, transfer, usage, and storage outside of your country of residence, and to the processing, transfer, usage, and storage of your data by any third-party vendors assisting IOA with recruitment and employment processes. If you do not consent, do not provide Personal Information for employment purposes via this Site.

5.1.6. Disclosure to Third Parties in Connection with Legal Matters. IOA may preserve, and has the right to disclose without your prior permission, any information about you or your use of this Site if IOA has a good faith belief that such action is necessary to: (a) Protect and defend the rights, property, or safety of IOA or its affiliates, employees, other users of this Site, or the public; (b) Enforce the terms and conditions that apply to use of this Site; or (c) Respond to claims that any content violates the rights of third parties. We may also disclose information deemed necessary by IOA to comply with any applicable law, regulation, legal process, or governmental request. By submitting Personal Information via this Site, you consent to the processing, transfer, usage, and/or storage of your Personal Information for any such purposes. If you do not consent, do not provide Personal Information via this Site.

5.1.7. Disclosure to Third Parties in Connection with Mergers and Acquisitions. IOA may disclose your Personal Information to third parties in connection with the sale or purchase of any business or assets. By submitting Personal Information via this Site, you consent to the processing, transfer, usage, and storage of your Personal Information for any such purposes. If you do not consent, do not provide Personal Information via this Site.

5.1.8. Disclosure of Blog Comments and Related Personal Information to Third Parties. If you choose to add a comment to any of IOA's blogs, we will collect your name and e-mail address, along with any Personal Information you choose to include in your comments. Such information may be transferred to the United States and/or other countries not deemed to ensure adequate levels of data protection. Further, in the event we publish your comments on our Site, your name will be published on our Site, along with your comments. By submitting any such comments, you consent to the processing, transfer, usage, and/or storage of your comments, including any Personal Information you provide. If you do not consent, do not submit comments to IOA's blogs via this Site.

6. External Links

This Site includes links to other websites. Please be aware that IOA is not responsible for the privacy practices of such other websites. We encourage users to read the privacy statements of each and every website they visit. This Website Privacy Policy applies solely to information collected by IOA when you visit this Site.

7. Storage and Security

7.1. Our systems are configured to provide privacy in Internet communications. The security measures we have taken help to ensure that when you visit this Site, your Personal Information is secure and encrypted, so that a third party cannot capture, read, or access your Personal Information while it is in transit between your computer and our system. However, the transmission of information via the Internet is not completely secure, and although IOA will do its best to protect your Personal Information, we cannot guarantee the security of information as it is transmitted to our Site. As such, any transmission is at your own risk. Once we have received your information, IOA will use appropriate procedures and security features to help prevent unauthorized access.

7.2. IOA has physical, electronic, and administrative safeguards in place to guard all Personal Information that is received from visitors to its Site. At IOA, we adhere to high standards of ethics and integrity in performing our jobs and conducting business. However, it should be noted that there are some things, such as viruses and hacker attacks, which IOA and other website operators cannot control.

7.3. IOA disposes of Personal Information in a secure manner by destroying or permanently erasing electronic data, and by disposing of hard copy data via burning, pulverizing, or utilizing shredding methods designed to ensure that Personal Information cannot be read or reconstructed.

8. Accessing, Correcting, or Removing Personal Information

If you would like to review your Personal Information, correct the Personal Information you have provided to us, or request that we remove your information from our records, contact IOA's Corporate Counsel via e-mail at compliance@ioausa.com or by mail to Insurance Office of America, Inc., Attention: Corporate Counsel, 1855 W. State Road 434, Longwood, FL 32750, or the appropriate data controller, with the access, correction, or removal request. In order to cover internal costs for responding to access requests, IOA may charge a reasonable fee to individuals desiring access to their Personal Information.

9. Contact Information for Questions, Comments, and Requests

If you have any questions or concerns about data privacy and security, the handling of your personal data or wish to make a request to access your information, please contact IOA's Corporate Counsel via e-mail at compliance@ioausa.com or by mail to Insurance Office of America, Inc., Attention: Corporate Counsel, 1855 W. State Road 434, Longwood, FL 32750

10. California Privacy Rights.

California Civil Code Section 1798.83 permits our Site visitors who are California residents to request and obtain once a year and free of charge, information about the Personal Information (if any) disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of Personal Information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to:

Insurance Office of America, Inc.
Attention: Corporate Counsel
1855 West State Road 434
Longwood, FL 32750