

Privacy Policy

Last Modified: February 2023

Independence American Insurance Company™ and its affiliates and subsidiaries (collectively, "IAIC") respect your privacy and are committed to protecting your personal information from unauthorized access and use through our compliance with this policy.

This policy describes the personal information that we may collect from you, or that you may provide on any subsidiary website of IAIC, and how that information may be used or disclosed by IAIC.

This policy does not apply to information we collect through any other means, or to information collected on any other non-related company, its affiliate or third-party site or by any third-party application that may be linked to or be accessible from the website.

Please read the following carefully to understand our policies and practices regarding your personal information and how we will treat it. By using or accessing our website, you agree to this privacy policy. This policy may change from time to time and your continued use of the website is deemed to be acceptance of such changes, so please check the policy periodically for updates.

Information Collected

We may collect personal information (for example, name, address, email address) on our websites when you voluntarily provide it to us or when you navigate through the sites, including usage details, IP addresses, cookies and web beacons. Only your domain is recognized when you visit our websites; your individual e-mail address is not. We may collect personal information from third parties such as our business partners. We do not sell or rent information about our customers to others.

Sources of Your Information

We collect information from the following sources:

- Information we collect through our websites and apps, which includes, but is not limited to: usage details, IP addresses, cookies, web beacons and web bugs.
- Information that you provide on quote requests or applications or other forms which may require some or all of the following: your name, address, email address, telephone number and Social Security number.
- Information from your transactions with us, our affiliated companies or our business partners. This includes, but may not be limited to, products and services you have purchased from us or information about your payment history or claims.

- Information we receive from your insurance broker. This may include updated information about your policy or account.
- Information we receive from third parties, such as non-IAIC owned business partners.

Sharing Information

In order to conduct our business and offer you the products and services that you may want, we may share your information as allowed or required by law. We may share your information with our affiliates or third parties outside of IAIC to service, market or underwrite our products and services to you. We may share your information with insurance agents and brokers who sell our products and services. We may also share your information with companies that we have formal agreements with to market or sell our products and services.

Working with these businesses allows us to provide you with a broader selection of insurance and investment products and services from our companies. These businesses sign a contract with us to keep your information private and secure and to use it only for the services we request. If any sharing of your information would require us to give you the option to opt-out of or opt-in to the information sharing, we will provide you with this option.

Medical Information

We obtain or share medical information only in connection with specific products and services. This may include underwriting a health insurance policy, processing a claim or any other use that we disclose to you before the information is collected.

About Independent Insurance Agents and Brokers

The independent insurance agents and brokers who sell our products and services are not our employees and are not subject to our privacy policy. Contact your agent or broker to learn more about their privacy practices.

Keeping Your Personal Information Safe

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored securely using common industry standards.

Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Please note that the information you share in public areas of the website, such as comments, may be viewed by any user of the website.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk.

Browsers & Security

In some instances we use Secure Socket Layer (SSL) encryption technology. SSL protects information as it crosses the Internet. You can tell if you are visiting a secure area by looking at the padlock symbol at the bottom of your browser screen. If it is "locked," you have a secure session.

Links to Other Sites

Many IAIC websites contain links to other third-party websites for informational or resource purposes. These other third-party websites are not under IAIC's direct control. We are not responsible for the privacy practices or the content of linked websites.

Accuracy of Your Information

If you need to update your information or if the information we have about you is inaccurate or incomplete, please contact us at:

Independence American Insurance Company: privacy@ipgpet.com

Include your name, address, telephone number and policy number (if applicable).

You can also request a copy of the information that we have about you in our files to make sure it is correct. You must make your request in writing and send it to the address shown on your policy or contract or to the address shown above. Within 15 business days of receiving your request, we will respond. If required by federal or state statute or regulation, we will advise you of any person or group to whom we have given information about you.

Opting Out of Marketing

We may communicate promotions and special offers to you from time to time via email. If you would like to opt out of receiving promotional and special offer emails, notify us:

Independence American Insurance Company: privacy@ipgpet.com

Please allow sufficient time for your request to be processed. It may take up to 10 days to process an email opt-out request.

Information Sharing

We may disclose personal information that you provide via this website to the following third parties:

- Our subsidiaries and affiliates.
- Contractors and service providers we use to support our business.
- In the event of merger, acquisition, or any form of sale of some or all of IAIC's assets, in which case personal information held by IAIC about its customers will be among the assets transferred to the buyer.

We may also disclose your personal information to third parties to:

- Comply with any court order or other legal obligation.
- Enforce or apply our Terms of Use.
- Protect the rights, property, or safety of IAIC, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Usage Details and IP Addresses

As you navigate through the website, we may also collect details of your visits to our website, including, but not limited to, traffic data, location data, logs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access, as well as information about your computer and internet connection, including your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' equipment, browsing actions and patterns, and does not identify any individual.

Cookies

Our websites send cookies to your computer. A cookie is a small file stored on the hard drive of your computer. We use cookies to improve our websites, customize your user experience, speed up searches, and recognize when you return to an IAIC website. Our cookies do not read data from your computer's hard drive or other websites' cookies. You may refuse to accept cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our websites.

Web Beacons

Pages of the websites may contain electronic images known as web beacons (also referred to as single-pixel gifs) that permit the Company to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). Web beacons are not used to access your personal information on the website and are only used to compile aggregated statistics concerning use of the website.

Third-Party Advertiser Use of Cookies and Web Beacons

Some advertisements on the website are served by third-party advertising companies. Please note that our advertisers may also use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about our users. We do not have control over third-party advertisers' cookies or how they may be used. If you have any questions about an advertisement, you should contact the responsible advertiser directly.

User Contributions

You are responsible for any content, including personal information, that you contribute to be published or displayed (hereinafter, "posted") on the websites, or transmit to other users of the

websites (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to other users of the websites at your own risk. Although we may limit access to certain pages and you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the websites with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. We are not responsible for circumvention of any privacy settings or security measures contained on the websites. You understand and acknowledge that, even after removal, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other website users. Proper access and use of information provided on the websites, including User Contributions, is governed by our Terms of Use and known or suspected violations should be reported to:

Independence American Insurance Company: privacy@ipgpet.com

Protecting Children

Our websites are not directed toward children under the age of 13. We do not knowingly collect or use personal information from children under 13. If you are a parent or legal guardian and have reason to believe that any of your children has provided us with personal information without your consent, please contact us and we will take steps to delete the information.

California Consumer Privacy Rights

If you are a California resident, you have certain privacy rights afforded to you under the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("CCPA, as amended"). For more information on the CCPA, as amended and how you may exercise your rights, please see our [California Consumer Privacy Act](#) page.

Changes to Our Privacy Policy

If we decide to make any changes to our privacy policy, those changes will go into effect on the effective date posted in the notice at the top of the revised privacy policy. The most current version of the privacy policy will apply to all current and past visitors of our websites and will replace any prior policies that are inconsistent. Your continued use of our websites and other services constitutes your acceptance of the practices described in the most current privacy policy.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us:

Independence American Insurance Company: privacy@ipgpet.com

HIPAA Notice of Privacy Practices

Independence American Insurance Company™
11333 N. Scottsdale Road, Scottsdale, AZ 85254
(Herein called the Company, We, Us, or Our)

THIS NOTICE DESCRIBES HOW PROTECTED HEALTH INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

This notice describes how We protect personal health information. We have information about you which relates to your medical, dental, vision and prescription drug coverage with Us. References to “We,” “Our,” “Us” and the “Company” refer to Independence American Insurance Company and its affiliates. Protected Health Information (“PHI”) is individually identifiable information about you. All of the following are examples of PHI: demographic information like your name, address and social security number; medical information that relates to your past, present or future physical or mental health that is collected, created or received from you, a health care provider, a health plan, employer or a health care clearinghouse; the providing of health care; or the past present or future payment for providing health care to you.

I. Our Legal Duty

We are required by applicable federal and state laws to maintain the privacy of your PHI and to provide you with this notice about Our privacy practices, Our legal duties, and your rights concerning your PHI. We are also required to notify you following a breach of your unsecured PHI, meaning the access, use, or disclosure of your PHI in a manner not permitted under the law and which compromises the security or privacy of your PHI. We must follow the privacy practices that are described in this notice while it is in effect. This notice takes effect April 14, 2003 (revised as of December 2, 2019) and will remain in effect until We replace it. We reserve the right to change Our privacy practices and the terms of this notice at any time, provided such changes are permitted by applicable law. We reserve the right to make the changes in Our privacy practices and the new terms of Our notice effective for all PHI that We maintain, including PHI We created or received before We made the changes. Before We make a significant change in Our privacy practices, We will change this notice and send the new notice to you at the time of change. You may request a copy of Our notice at any time. For more information about Our privacy practices, or for additional copies of this notice, please contact Us using the information listed at the end of this notice.

II. Uses and Disclosures of Your PHI

In conducting Our business, We will create records regarding you and the insurance services We provide you. The main reasons for which We may use and may disclose your PHI are to evaluate and process any requests for medical coverage and claims for benefits you may make. The following describe these and other uses and disclosures, together with some examples.

A. Uses and Disclosures of your PHI that do not require your written authorization

Treatment: We may use or disclose your PHI to facilitate medical treatment by providers. For example, your PHI may be provided to a physician to whom you have been referred to ensure that the physician has the necessary information to treat you. We may request the services of a business associate to assist Us in these activities.

Payment: We may use and disclose your PHI to facilitate payment of benefits under your insurance coverage. For example, We might disclose your PHI to determine your eligibility for benefits, to coordinate benefits, to examine medical necessity, to obtain payments and to issue explanations of benefits. We also may use your PHI to obtain payment from third parties that may be responsible for your premium payments, such as family members.

Health Care Operations: We may use and disclose your PHI as necessary, and as permitted by law, to operate our business. Health care operations include: (i) rating Our risk and determining Our premiums for your insurance; (ii) conducting quality assessment and improvement activities; (iii) conducting or arranging for medical review, legal services, audit services, fraud and abuse detection and compliance programs; and (iv) business planning and development.

To Your Family and Friends: We may disclose your PHI to a family member, friend, or other person to the extent necessary to help with your health care or for payment of your health care. We may use or disclose your name, location and general condition or death to notify, or assist in the notification, of (including identifying or locating) a person involved in your care. Before We disclose your PHI to a person involved with your health care or payment for your health care, We will provide you with an opportunity to object to such uses or disclosures. If you are not present, or in the event of your incapacity or an emergency, We will disclose your PHI based on Our professional judgment of whether the disclosure would be in your best interest.

Your Employer or Organization Sponsoring Your Health Plan: We may disclose Your PHI and the PHI of others enrolled in your group insurance plan to the employer or other organization that sponsors your group insurance plan to permit the plan administrator to perform plan administration functions. We may also disclose summary information about the enrollees in your group insurance plan to the plan administrator to use to obtain premium bids for the health insurance coverage offered through your group insurance plan or to decide whether to modify, amend or terminate your group insurance plan. The summary information We may disclose will summarize claims history, claims expenses, or types of claims experienced by the enrollees in your group insurance plan. The summary information will be stripped of demographic information about the enrollees in the group insurance plan, but the plan administrator may still be able to identify you or other participants in your group health plan from the summary information. We may also disclose enrollment and disenrollment information to either the plan administrator or plan sponsor of your group insurance plan.

Underwriting: We may receive your PHI for underwriting, premium rating or other activities relating to the creation, renewal or replacement of a contract of health insurance or health benefits. Your genetic information will not be used for underwriting purposes. We will not use or further disclose this PHI for any other purpose, except as required by law, unless the contract of health insurance or health benefits is placed with Us, or where We disclose such information to MIB Group, Inc., a non-profit membership organization of life and health insurance companies, which operates an information exchange on behalf of its members. In those cases, Our use and disclosure of your PHI will only be as described in this notice.

Public Benefit: We may use or disclose your PHI as authorized by law for the following purposes deemed in the public interest or benefit:

1. as required by law;
2. for public health activities, including disease and vital statistic reporting, child abuse reporting; FDA oversight, and to employers regarding work-related illness or injury;
3. to report adult abuse, neglect, or domestic violence;
4. to health oversight agencies;
5. in response to court and administrative orders and other lawful processes;
6. to law enforcement officials pursuant to subpoenas and other lawful processes, concerning crime victims, suspicious deaths, crimes on Our premises, reporting crimes in emergencies, and for purposes of identifying or locating a suspect or other person;
7. to coroners, medical examiners, and funeral directors;
8. to organ procurement organizations;
9. to avert a serious threat to health and safety;
10. to the military and to federal officials for lawful intelligence, counterintelligence, and national security activities;
11. to correctional institutions regarding inmates; and
12. as authorized by state worker's compensation laws.

Business Associates: Certain aspects and components of Our business are preformed through contracts with outside persons or organizations. Examples of these outside persons and organizations include Our duly appointed insurance agents, third party administrators, financial auditors, actuarial and underwriting services, reinsurers, legal services, enrollment and billing services, claim payment and medical management services and collection agencies. At times it may be necessary for Us to provide your PHI to one or more of these outside persons or organizations who assist Us with Our payment or health care operations. In all cases, We require these business associates to appropriately safeguard the privacy of your information.

B. Uses and Disclosures of your PHI that require your written authorization

Other than for the purposes described above, you must provide Us with your written authorization to use and disclose your PHI. You may give Us written authorization to use your PHI or to disclose it to anyone for any purpose. If you give Us an authorization, you may revoke it in writing at any time. Your revocation will not affect any use or disclosure permitted by your authorization while it was in effect. The following are examples in which We would need a written authorization to use and disclose your PHI:

Psychotherapy Notes: Use or disclosure of psychotherapy notes except to carry out treatment, payment, or health care operations or as permitted by law.

Marketing: Use or disclosure of your PHI for marketing, except if the communication is in the form of face to face communication by Us or a promotional gift of nominal value provided by Us.

Sale of PHI: Any sale involving your PHI, as required by law.

III. Individual Rights

The following are your rights with respect to your PHI:

Access: In most cases, you have the right to inspect and obtain a copy of the PHI that We maintain about you. To inspect and copy PHI, you must submit your request in writing using the “Contact Information” provided at the end of this Notice. To receive a copy of your PHI, you may be charged a fee for the costs of copying, mailing or other supplies associated with your request. However, certain types of PHI will not be made available for inspection and copying. This includes psychotherapy notes and PHI collected by Us in connection with, or in reasonable anticipation of any claim or legal proceeding. In very limited circumstances We may deny your request to inspect and obtain a copy of your PHI. If We do, you may request that the denial be reviewed. The review will be conducted by an individual chosen by Us who was not involved in the original decision to deny your request. We will comply with the outcome of that review.

Disclosure Accounting: You have the right to receive a list of instances in which We or Our business associates disclosed your PHI for purposes other than for treatment, payment, health care operations or as otherwise authorized by you since April 14, 2003 or the date coverage became effective for you, whichever is later. For example, We would account for your PHI or demographic information We disclose during an audit by an insurance department or pursuant to a court order. You must make your request in writing using the “Contact Information” provided at the end of this Notice. If you request this accounting more than once in a 12-month period, We may charge you a reasonable, cost-based fee for responding to these additional requests. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.

Restriction: You have the right to request a restriction or limitation on PHI We use or disclose about you for treatment, payment or health care operations, or that We disclose to someone who may be involved in your care or payment for your care, like a family member or friend. While We will consider your request, **We are not required to agree to it.** If We do agree to it, We will comply with your request. To request a restriction, you must make your request in writing using the “Contact Information” provided at the end of this Notice. In your request, you must tell Us (1) what information you want to limit; (2) whether you want to limit Our use, disclosure or both; and (3) to whom you want the limits to apply (for example, disclosures to your spouse or parent). We will not agree to restrictions on PHI uses or disclosures that are legally required, or which are necessary to administer Our business.

Confidential Communications: You have the right to request that We communicate with you about PHI in a certain way or at a certain location if you tell Us that communication in another manner may endanger you. For example, you can ask that We only contact you at work or by mail. To request confidential communications, you must make your request in writing using the “Contact Information” provided at the end of this Notice and specify how or where you wish to be contacted. We will accommodate all reasonable requests.

Notice: You have the right to be notified in the event of a breach that involves your unsecured PHI.

Amendment: If you believe that your PHI is incorrect or that an important part of it is missing, you have the right to ask us to amend your PHI while it is kept by or for Us. You must provide your request and your reason for the request in writing using the “Contact Information” provided at the

end of this Notice. We may deny your request if it is not in writing or does not include a reason that supports the request. In addition, We may deny your request if you ask Us to amend PHI that: (i) is accurate and complete; (ii) was not created by Us, unless the person or entity that created the PHI is no longer available to make the amendment; (iii) is not part of the PHI kept by or for Us; or (iv) is not part of the PHI which you would be permitted to inspect and copy.

Right to File a Complaint: If you believe your privacy rights have been violated, you may file a complaint with Us at the address below or with the Secretary of the Department of Health and Human Services. To file a complaint with Us, submit your complaint using the "Contact Information" provided at the end of this Notice. All complaints must be submitted in writing. **You will not be retaliated against for filing a complaint.**

Contact Information: If you have questions regarding this Notice or need further assistance regarding this Notice, please contact Us at:

**Attn—Legal Department
Independence American Insurance Company
11333 N. Scottsdale Road
Scottsdale, AZ 85254
privacy@ippget.com**