



## Harford Mutual Insurance Group Internet Privacy Policy

**Last Revised: September 29, 2023**

At Harford Mutual Insurance Group (collectively with its subsidiaries, “Company,” “we,” “us,” and “our,”), we are committed to building mutual success. Our commitment to this success is carried through by protecting and securing your privacy through our compliance with this Internet Privacy Policy (the “Policy”).

This Policy describes:

- The types of information we collect from you or that you may provide when you visit our website available at: <https://www.harfordmutual.com/> as well as any websites owned by Harford Mutual Insurance Group, including any content, functionality and services offered on or through the websites (collectively, our “Website” or “Websites”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on the Websites or in emails and other electronic messages between you and the Websites, and information gathered when you interact with our advertising on third-party websites if such advertisements include links to this Policy.

This Policy does not apply to information collected by us offline or through any other means, including on any other website operated any third party, or information collected by any third party through any application or content (including advertising) that may link to or be accessible from the Websites (for further information, see below, “Third-party Websites”).

Please read this Policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use our Websites. By using our Websites, you agree to the terms of this Policy. This Policy may change from time to time (see below, “Changes to this Policy”). Your continued use of our Websites after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

### **Internet Terms of Use; Customer Privacy Notice**

This Policy should be read in conjunction with our Internet Terms of Use, into which this Policy is incorporated by reference. This Policy does not apply to Company’s website portal, available at [www.harfordmutual.biz](http://www.harfordmutual.biz). For more information on how Company

collects and uses Personal Information on Company's portal, please see our Agency Portal Privacy Policy.

To the extent that we obtain your nonpublic personal information ("NPI") from you as a member or policy holder through our Websites, our use and disclosure of this NPI is governed by our Customer [Privacy Notice](#). Please review our Customer Privacy Notice for our nonpublic personal information practices.

### **What We Collect and How We Collect It**

To ensure that we provide you with the best possible experience, we will store, use, and share information about you in accordance with this Policy.

#### *Information You Provide to Us*

Personal Information is any information that can be used to individually identify you from a larger group. In particular, the Website may collect the following categories of Personal Information from users of the Website:

Category	Examples	Collected
Internet or other similar network activity.	Information on a consumer's interaction with a website, application, or advertisement.	YES

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, when you:
  - participate in online billing;
  - subscribe to one of our e-newsletters;
  - submit a job application; or
  - communicate with us, such as request information.
- Indirectly from you. For example, through information we collect from you in the course of providing our services to you.
- Directly and indirectly from activity on our Website. For example, from Website usage details that are collected automatically. For more information on automatic information collection, please review the "Automated Information Collection" section below.

The amount of Personal Information gathered by us varies depending on the information you provide, which may vary in each case. In some cases, you may be able to provide Personal Information via email or free text boxes, such as contacting the Company to request further information. When providing your Personal Information, please provide only relevant information and do not provide unnecessary sensitive information, such as

Social Security numbers, credit card information or other sensitive personal data. Additionally, we may ask you to create a username and password that should only be known to you.

### *Automated Information Collection*

In addition to the information that you provide to us, we may also collect information about you during your visit to our Websites. We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your internet address (IP Address), the pages you have viewed, and the actions you have taken while using the Websites. Some of the tools we use to automatically collect information about you may include:

(a) Cookies. A “cookie” is a small data file transmitted from a website to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use either (or both) of them:

(1) session cookies, which do not stay on your device after you close your browser, and

(2) persistent cookies, which remain on your device until you delete them or they expire.

Of course, if you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser’s settings. However, by disabling cookies on your device, you may be prohibited from full use of the Website’s features or lose access to some functionality.

We may use the following categories of cookies on our Website.

- i. **Strictly Necessary Cookies.** These cookies are essential in order to enable you to move around the Website and use its features. Without these cookies, services you have requested, such as maintaining a record of your purchased items, cannot be provided.
- ii. **Performance Cookies.** These cookies collect anonymous information on how you use our Website to help us understand how you arrive at our Website, browse or use our Website and highlight areas where we can improve, such as navigation. The data stored by these cookies never shows personal details from which your individual identity can be established.
- iii. **Functionality Cookies.** These cookies remember choices you make such as the country from which you visit our Website, your preferred language, and your search parameters. This information can then be used to provide you with an experience more appropriate to your selections and to make your visits to our Website more

tailored to your preferences. The information in these cookies may be anonymized. These cookies cannot track your browsing activity on other websites.

- iv. **Targeting Cookies or Advertising Cookies.** These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third-party advertising networks. These cookies remember the websites you visit and that information is shared with other parties, such as advertisers.

(b) Web Beacons. A Web Beacon is an electronic image. Web Beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your behavior. If you choose to receive emails from us, we may use Web Beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. Some of the third-party marketers we engage with may use Web Beacons to track your interaction with online advertising banners on our Websites. This information is only collected in aggregate form and will not be linked to your Personal Information. Please note that any image file on a webpage can act as a Web Beacon.

(c) Embedded Web Links. Links provided in our emails and, in some cases, on third-party websites may include tracking technology embedded in the link. The tracking is accomplished through a redirection system. The redirection system allows us to understand how the link is being used by email recipients. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the Personal Information that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.

(d) Third-party Websites and Services. We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the marketing campaigns we are contracting them to provide. The information collected can be gathered on our Website and also on the websites where our marketing communications are appearing. For example, we may collect data where our banner advertisements are displayed on third-party websites.

(e) Google Analytics and Google Tag Manager. The Website sends aggregated non-Personal Information to Google Analytics for the purpose of providing us with the ability to conduct technical and statistical analysis on the Website's

performance. For more information on how Google Analytics and Google Tag Manager support the Website and use information sent from the Website, please review Google's privacy policy available at <https://policies.google.com/technologies/partner-sites>, Google's data privacy practices for Google Analytics at <https://support.google.com/analytics/answer/6004245> and Google's data privacy practices for Google Tag Manager at <https://support.google.com/tagmanager/answer/9323295?hl=en>.

## **Your Choices and Selecting Your Privacy Preferences**

We want to provide you with relevant information that you have requested.

If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Transactional or service-oriented messages are usually excluded from such preferences, as such messages are required to respond to your requests or to provide goods and services, and are not intended for the purposes of marketing.

We will not intentionally send you email newsletters and marketing emails unless you consent to receive such marketing information. After you request to receive these emails, you may opt out of them at any time by selecting the "unsubscribe" link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided.

Text Messaging. In using the Website or doing business with Harford, you may have the opportunity to receive SMS or "text" messages, pre-recorded voice messages or auto-dialed phone calls from the Company, its affiliates and related entities as well as third parties. Such messaging may be used to authenticate your identity or mobile device, as well as provide you informational updates about services or products you may have requested. In providing your mobile device number or cell phone number to the Company, you knowingly consent to such communications from the Company or for the Company to use your cell phone number or mobile device number in accordance with the Company's Internet Terms of Use. In providing your number, you represent that you have the authority to agree to receive text messages at the telephone number that you provide to the Company, or from which you sent the text message request to us. You further acknowledge that no purchase is required to opt into this service, and you may opt out at any time by following the instructions provided in our communications to you.

Any such communications you receive from us will be administered in accordance with your preferences and this Policy.

## **Accuracy and Access to Your Personal Information**

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing.

Where we can provide you access to your Personal Information in our possession, we may ask you for a username and password or other identifying information to help protect your privacy and security. If you create a password, we recommend that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.

Should you have an account, you may view and change the Personal Information that you have provided to us, you can log in to your account and follow the instructions on that webpage, or contact us directly for assistance.

### **Information of Minors**

We do not intentionally seek to gather information from individuals under the age of thirteen (13). We do not target the Websites to minors, and would not expect them to be engaging with our Websites or services. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any Personal Information that we have collected about minors, we will take steps to securely remove it from our systems.

### **How We Use Your Information**

The information we gather and that you provide is collected to provide you information and the services you request, in addition to various other purposes, including, but not limited to:

- Security, credit or fraud prevention purposes.
- Providing you with effective customer service.
- Inviting you to participate in surveys and providing feedback to us (in accordance with any privacy preferences you have expressed to us).
- Improving the content, functionality and usability of this Website.
- Improving our products and services.
- Improving our marketing and promotional efforts.
- Assisting you with items such as personalized experiences, facilitation of product usage, and enforcement of the Internet Terms of Use.
- Preventing malicious activity and providing you with a secure experience.
- Providing service and support for services you request.
- Providing marketing communications that are effective and optimized for you.
- Keeping you up-to-date with the latest benefits available from us.
- Preventing unwanted messages or content.
- Measuring the performance of our marketing programs.
- Contacting you about services and offers that are relevant to you.

Duration. The length of time Company intends to retain Personal Information, including sensitive information, if any, is for as long as reasonably necessary to carry out Company's intended business purpose for such information.

## **How We Disclose Your Information**

We do not sell or lease your Personal Information to any third party. We may disclose your Personal Information to our trusted third-party business partners in accordance with this Policy.

*Partners and Service Providers.* We work with a number of partners that help us process your requests, deliver customer service and support, send email marketing communications, and provide experiences that you have come to expect from us. We may disclose your Personal Information with these third parties in order to fulfill the service that they provide to us.

*Compliance with Laws.* Except as described in this Policy, we will not disclose your Personal Information with third parties without your notice and consent, unless it is under one of the following circumstances:

- Responding to duly authorized information requests from law enforcement or other governmental authorities.
- Complying with any law, regulations, subpoena, or court order.
- Investigating and helping prevent security threats, fraud, or other malicious activity.
- Enforcing or protecting the rights and properties of Company or its subsidiaries.
- Protecting the rights or personal safety of Company's employees.

*Sale of Business or Merger.* There are circumstances where the Company may decide to buy, sell, or reorganize its business in selected countries. Under these circumstances, it may be necessary to disclose or receive Personal Information with prospective or actual partners or affiliates. In such circumstances, the Company will ensure your information is used in accordance with this Policy.

## **Third-party Websites**

We have agreements with authorized third parties that allow you direct access to their website from our Websites. If you go to these websites, you may be asked to provide non-public personal information. You may also become a part of that business' customer base and be subject to their policies regarding the handling of customer data. Harford Mutual is not responsible for the privacy practices on those websites, even though the Harford Mutual logo may appear on those sites.

This Policy does not apply to those websites nor websites or other domains that are maintained or operated by other third parties or our affiliates. Our Websites may link to third-party websites and services, but these links are not endorsements of these sites, and this Policy does not extend to them. Because this Policy is not enforced on these

third-party websites, we encourage you to read any posted privacy policy of the third-party website before using the service or site and providing any information.

## **Your Rights Under State Law**

### California

- *Shine the Light Law.* Pursuant to California Civil Code Section 1798.83, as applicable, we will not disclose or share your Personal Information with third parties for the purposes of third-party marketing to you without your prior consent.
- *Do Not Track Signals.* Other than as disclosed in this Policy, the Websites do not track users over time and across third-party websites to provide targeted advertising. Therefore, the Websites do not operate any differently when they receive Do Not Track (“DNT”) signals from your internet web browser.

### Your Consumer Rights

Some state laws in the United States provide consumers with additional rights with respect to their personal information (also known as “personal data”), as those terms are defined under those applicable state laws. Such state laws may include, but are not limited to, the California Consumer Privacy Act of 2018 (the “CCPA”) as amended by the California Privacy Rights Act, the Colorado Privacy Act (“CPA”) and the Virginia Consumer Data Protection Act (“VCDPA”). Any personal information we collect is collected for the commercial purpose of effectively providing our services to you, as well as enabling you to learn more about, and benefit from, our services.

If you are a consumer in a state that provides consumer rights, please be advised that Harford Mutual Insurance Group does not meet the regulatory thresholds of a “business” or “controller” as that term is defined under applicable state laws and therefore does not afford consumers these rights with respect to their Personal Information. Regardless, all Personal Information will be processed in accordance with this Policy.

## **For Visitors Outside of the United States**

Our Websites are designed for use by individuals in the United States only. We do not warrant or represent that this Policy or the Website’s use of your Personal Information complies with the laws of any other jurisdiction. Furthermore, to provide you with our services, we may store, process, and transmit information in the United States and other locations around the world, including countries that may not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy.

## **Changes to this Policy**

We reserve the right to change or modify our policies at any time concerning this Policy. If we make any changes to this Policy, a revised Policy will be posted on this webpage and the date of the change will be reported in the “Last Revised” block above. You can get to this page from any of our webpages by clicking on the “Privacy Policy” link (usually at the bottom of the screen).



## **Safeguarding the Information We Collect**

We use reasonable technical, administrative, and physical safeguards in order to protect your Personal Information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as applicable, to safeguard your information through the proper use and security of any online credentials used to access your Personal Information, such as a username and password. If you believe your credentials have been compromised, please change your password. Please also notify us of any unauthorized use.

## **How to Contact Us**

We value your opinions and welcome your feedback. To contact us about this Policy or your Personal Information, please contact us at [privacy@hm1842.com](mailto:privacy@hm1842.com).