## PRIVACY POLICY

Welcome, and thank you for your interest in Work Comp Saver ("Work Comp Saver", "we," or "us"). Our web site at <a href="https://www.WorkCompSaver.com">https://www.WorkCompSaver.com</a> (the "Site"), and all related web sites, downloadable software, mobile applications (including tablet applications), and other services provided by us and on which a link to this Privacy Policy is displayed, and all other communications with individuals though from written or oral means, such as email or phone (collectively, together with the Site, our "Service").

We respect the privacy rights of our users and are strongly committed to protecting your privacy. This Privacy Policy ("**Policy**") applies to and describes the personal information we gather on or through the Service, how we use and disclose such information, and the steps we take to protect such information.

If you do not provide certain Personal Data (as defined below), not all functionality on the Site will be available. Personal Data is obtained directly from you, from activity on the Site, and other parties with whom we may work, such as service providers, business partners, advertisers, advertising technology providers, data analytics providers, and social networks. Do not provide information about others unless you are authorized to do so and those persons agree to have all information used, disclosed, and transferred in accordance with this Privacy Policy. By submitting any information about others, you represent and warrant that you are authorized to do so and that you have received authorization from the person about whom you are providing the information, and that person has consented to have all information used, disclosed, and transferred in accordance with this Privacy Policy.

If you are a California or Virginia resident, please review the Section below entitled, "California and Virginia Privacy Rights."

To understand what cookies we use, please review our Cookie Notice <u>here</u>. The Cookie Notice is hereby incorporated into and made a part of this Policy.

This Policy is incorporated into and is subject to the Work Comp Saver Terms of Service (the "Terms" or "Terms of Service") <u>here</u>.

#### 1. Definitions

Capitalized terms used but not defined in this Policy have the meaning given to them in the Terms.

"Personal Data" means any information relating to an identified or identifiable natural person.

- "Public Area" means the area of the Site that can be accessed by both Users and Visitors without needing to log in.
- "Restricted Area" means the area of the Site that can be accessed only by Users and where access requires logging in.
- "Service" means Work Comp Saver Services as defined in the Terms.
- "User" means an individual who has agreed to the terms of, and is authorized to access, the Restricted Area and can access the Public Area as well.
- "Visitor" means an individual other than a User who uses the Public Area but has no access to the Restricted Area.

## 2. Roles & Responsibilities

This section outlines Work Comp Saver's roles and responsibilities concerning the processing of Personal Data:

#### 2.1 Work Comp Saver as a Data Controller:

This Privacy Policy describes Work Comp Saver's practices when we act as a data controller. As a data controller, we determine the purposes and means of processing your Personal Data. This includes data collected directly from you, such as when you sign up for an Account, register for events or interact with our Service. It also covers data collected automatically, such as through cookies and tracking technologies, and data we receive from third parties. Our responsibilities include ensuring the lawfulness, fairness, and transparency of data processing and safeguarding your rights as a data subject.

#### 2.2 Work Comp Saver as a Data Processor:

If you are a Client and want to understand our data processing practices when we act as a data processor, please refer to the <u>Work Comp Saver Data Processing Addendum</u> ("DPA"). The DPA provides detailed information about our responsibilities and obligations when processing data on behalf of our Clients. This includes processing Client Data according to the Client's instructions, ensuring data security, and assisting Clients in fulfilling their data protection obligations. We do not own, control, or direct the use of Client Data stored or processed through our Service. Only the Client or User has the right to access, retrieve, and direct the use of such Client Data.

#### 2.3 Data Subject's and Client's Responsibilities:

If you are a data subject seeking to exercise your rights (such as access, rectification, deletion, etc.) regarding Personal Data processed by a Work Comp Saver Client, please

contact the Client directly. The Client, as the data controller, is responsible for handling such requests according to applicable data protection laws. Work Comp Saver processes Client Data solely on behalf of our Clients and according to their instructions. We are largely unaware of the specific data stored by Clients and do not directly access such data except as authorized by the Client or as necessary to provide our Service.

For any questions or further clarification on these roles, please contact our Data Protection Officer at <a href="mailto:customercare@WorkCompSaver.com">customercare@WorkCompSaver.com</a>.

#### 3. The Information We Collect

We collect different types of information from or through the Service, including without limitation through the methods summarized below.

#### 3.1 Information You Provide Directly to Work Comp Saver

- Account signup: When you sign up for an Account to access our Service, we
  ask for information, like your name, contact number, business email address, and
  company name, to complete the Account signup process. You may also provide
  us with more information, such as your photo, time zone and insurance
  information, but we don't require that information to sign up for an Account.
- Event registrations and other form submissions: We record information that you submit when you (a) register for any event, including webinars or seminars, (b) subscribe to our newsletter or any other mailing list, (c) submit a form in order to download any product, whitepaper or other materials, (d) participate in contests or respond to surveys, or (e) submit a form to request customer support or to contact Work Comp Saver for any other purpose.
- Payment processing: When you buy something from us, we ask you to provide your name, contact information, credit card information or other payment account information. When you submit your card information, we store the name and address of the cardholder, the expiration date and the last four digits of the credit card number. We do not store the actual credit card number. For quick processing of future payments, if you have given us your approval, we may store your credit card information or other payment information in an encrypted format in the secured servers of our Payment Gateway Service Providers.
- Testimonials: When you authorize us to post testimonials about our Service on websites, we may include your name and other Personal Data in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it. If you wish to update or delete your testimonial, you can contact us at customercare@WorkCompSaver.com.
- Interactions with Work Comp Saver: We may record, analyze and use your interactions with us, including email, telephone, and chat conversations with our sales and customer support professionals, to improve our interactions with you and other customers.

#### 3.2 Automatically Collected Information

- Information from browsers, devices and servers: When you visit our Site, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about Visitors to our Site and accommodate our Sites to the Visitors.
- Information from cookies and tracking technologies: We use temporary and permanent cookies to identify Visitors and Users and to enhance user experience. We embed unique identifiers in our downloadable products to track usage of the products. We also use cookies, beacons, tags, scripts, and other similar technologies to identify Visitors, track Site navigation, gather demographic information about Visitors and Users, understand email campaign effectiveness and target visitor and user engagement. You can learn more about the cookies used on our Site and change your Cookie settings in our Cookie Notice.
- Information from application logs and mobile analytics: We collect
  information about your and your Users' use of our Service from application logs
  and in-house usage analytics tools and use it to understand how your use and
  needs can improve our Service. This information includes clicks, scrolls, features
  accessed, access time and frequency, errors generated, performance data,
  storage utilized, user settings and configurations, and devices used to access
  and their locations.

#### 3.3 Information We Collect from Third Parties

- Signups using federated authentication service providers: You can log in to the Service using supported federated authentication service providers, such as LinkedIn, Microsoft and Google. These services will authenticate your identity and give you the option to share certain Personal Data with us, such as your name and email address. You should check your privacy settings on each integrated service to understand what information that integrated service makes available to us and make changes as appropriate. Please review each integrated service's terms of use and privacy notices carefully before using their services and connecting to our Service.
- Referrals: If someone has referred our Service to you through any of our referral
  programs, that person/entity may have provided us with your name, email
  address and other Personal Data. You may contact us at
  <u>customercare@WorkCompSaver.com</u> to request that we remove your
  information from our database. If you provide us information about another
  person, or if another person/entity gives us your information, we will only use that
  information for the specific reason for which it was provided to us.
- Information from our resellers, partners and service providers: If you contact any of our resellers, partners or service providers or otherwise express interest in our Service to them (e.g., by filling out a form and opting in to be contacted by

Work Comp Saver), the resellers, partners or service providers may pass your name, email address, company name and other information to Work Comp Saver. If you register for or attend an event that Work Comp Saver sponsors, the event organizer may share your information with us. Work Comp Saver may also receive information about you from review sites if you comment on any review of our Service and from other third party service providers we engage to market our Service.

- Information we collect and process when you integrate the Service with third parties: You may connect third party integrations to your Work Comp Saver Account, which may ask for certain permissions to access data or send information to or from your Work Comp Saver Account. It is your responsibility to review any third party integrations you authorize. We may collect information about the types of integrations you use in your Work Comp Saver Account. Any permission(s) granted by you grants these third parties access to your data, which may include (but is not limited to) granting third party applications access to view, store, and modify the Client Data on your Work Comp Saver Account. We are not responsible for the practices of third party integrations, so please carefully review the permissions you grant to third party applications.
- Information from social media sites and other publicly available sources: When you provide feedback or reviews about our Service, interact, or engage with us on marketplaces, review sites or social media sites, such as Facebook, X (Twitter), LinkedIn and Instagram through posts, comments, questions and other interactions, we may collect such publicly available information, including profile information, to allow us to connect with you, improve our Service, better understand User reactions and issues, or to reproduce and publish your feedback on our Site. We must tell you that once collected, this information may remain with us even if you delete it from these sites. Work Comp Saver may also add and update information about you from other publicly available sources.

#### 4. How We Use the Information We Collect

We use the information that we collect in a variety of ways to provide the Service and operate our business, including the following:

#### 4.1 Operations

We use the information to operate, maintain, enhance and provide all features of the Service:

- To set up and maintain your Account and to do all other things required for providing our Service, such as enabling collaboration, providing Site and email hosting, and backing up and restoring your data;
- To provide customer support and to analyze and improve our interactions with Clients and Users;

• To detect and prevent fraudulent transactions and other illegal activities, report spam, and protect the rights and interests of Work Comp Saver, its Clients and Users, third parties and the public.

#### 4.2 Improvements

We use the information:

- To understand how Users use our Service, to monitor and prevent problems, and to improve our Service;
- To analyze trends, administer our Site, and track visitor navigations on our Site to understand what Visitors are looking for and to better help them;

If this purpose requires Work Comp Saver to process Client Data, the data will only be used in anonymized or aggregated form.

#### 4.3 Communications

In addition to the purposes mentioned above, we may use your information for the following purposes:

- To communicate with you (such as through email) about products and materials that you have downloaded and services that you have signed up for, changes to this Policy, to the Terms of Service, the list of Sub-processors, or other important notices;
- To keep you posted on new additions to our Service, upcoming events, offers, promotions and other information that we think will be of interest to you;
- To ask you to participate in surveys or to solicit feedback on our Service.

#### 4.4 Analytics

- To update, expand and analyze our records, identify new customers, and provide products and services that may be of interest to you;
- To monitor and improve marketing campaigns and make suggestions relevant to the User. This includes (i) retargeting Users interested in our Service, (ii) identifying and engaging new audiences similar to our high-value Clients, and (iii) ensuring that Clients who have completed actions like purchases do not receive irrelevant advertisements.

## 4.5 Additional Limits on Use of Your Google User Data

Notwithstanding anything else in this Policy, if you provide Work Comp Saver access to your Google data (e.g. when you enable the email sync feature with your Google account), Work Comp Saver's use of that data will be subject to these additional restrictions:

Work Comp Saver will only use access to read, write, modify or control Gmail
message bodies (including attachments), metadata, headers, and settings to
provide a web email client that allows Users to compose, send, read, and
process emails and will not transfer this Gmail data to others unless doing so is

- necessary to provide and improve these features, comply with applicable law, or as part of a merger, acquisition, or sale of assets.
- Work Comp Saver will not use this Gmail data for serving advertisements.
- Work Comp Saver will not allow humans to read this data unless we have your
  affirmative agreement for specific messages, doing so is necessary for security
  purposes, such as investigating abuse, to comply with applicable law, or for Work
  Comp Saver's internal operations and even then only when the data have been
  aggregated and anonymized.

Work Comp Saver's use of information received and Work Comp Saver's transfer of information to any other app from Google APIs will adhere to <u>Google API Services User Data Policy</u>, including the Limited Use requirements.

#### 5. To Whom We Disclose Information

Except as described in this Policy, we will not intentionally disclose the Personal Data that we collect or store on the Service to third parties without the consent of the applicable Visitor, User or Client. We may disclose information to third parties if you consent to us doing so. In addition, we may disclosure information under the following circumstances:

#### **5.1 Unrestricted Information**

Any information you voluntarily choose to include in a Public Area of the Service, such as a public profile page, will be available to any Visitor or User with access to that content. For example, we make available various community forums and self-help support materials, as well as blogs and other means for you to post information on our Site. This information you post is publicly-available information that you choose to disclose, and it may be read, collected, and processed by others who visit the Site. Except for your username (which may be your real name) and the details that you choose to include in your profile, the categories of data disclosed in these circumstances will depend on what information you choose to provide. Your posts and certain profile information may remain even after you terminate your Work Comp Saver account. We urge you to consider the sensitivity of any information you may disclose in this way. We will correct or delete any information you have posted on the Site if you so request, as described in "Your Choices" below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

#### 5.2 Other Users in Your Company Account

Information about your use of the Service is available to the administrator(s) of your Work Comp Saver Account and, depending on the settings chosen by the Account Users, also to other Users for the purposes of providing the Service.

Please note that while Administrator(s) have overall control, individual Users control the visibility of their synced emails. Each User is responsible for the contents of their mail tab, which cannot be altered by any other User in the Account.

#### **5.3 Service Providers**

We work with third party service providers who provide Site, application development, hosting, maintenance, security and fraud detection, and other services for us. These third parties may have access to or process Personal Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

#### 5.4 Social Media

Work Comp Saver's Site may use social media features, such as the Meta/Facebook "like" button, LinkedIn and X (formerly Twitter) sharing features, and other similar widgets ("Social Media Features"). You may be given the option by such Social Media Features to post information about your activities on a Site to a profile page of yours that is provided by a third party social media network in order to share content with others within your network. Social Media Features are either hosted by the respective social media network, or hosted directly on our Site. To the extent the Social Media Features are hosted by the respective social media networks and you click through to these from our Site, the latter may receive information showing that you have visited our Site. If you are logged in to your social media account, it is possible that the respective social media network can link your visit to our Site with your social media profile. Your interactions with Social Media Features are governed by the privacy notices (and any other applicable terms) of the respective companies that provide the relevant Social Media Features.

#### 5.5 Advertising and Marketing

We may partner with third party ad networks to display advertising on our Site or to manage our advertising on other sites. Our ad network partners use cookies, web beacons, and data we share with them to collect information about your activities on our website and other websites and provide you with targeted advertising based on your interests. If you wish not to have your information used for the purpose of serving you targeted ads, you may opt out by using these services:

https://optout.networkadvertising.org/ or https://optout.aboutads.info/. Please note this does not opt you out of being served advertising, you will continue to receive generic ads. Please refer to the "Opting Out" Section of this Policy for detailed instructions about opting out of specific data processing activities.

#### 5.6 Partners

We may share data with trusted Work Comp Saver partners to contact you about products or services that are complimentary to Work Comp Saver's services, help us perform statistical analysis, provide sales support, or provide customer support. Partners are prohibited from using your Personal Data except for these purposes, and they are required to maintain the confidentiality of your data. We partner with trusted third parties to provide content that we think may be relevant to you. When you engage with these partners, a partner will provide a link to the partner's privacy notice so you can learn how to opt out of the partner's communications. These partners are required to adhere to our privacy and data protection policies. If you do not want us to share your Personal Data with these companies, please contact our partner's team at customercare@WorkCompSaver.com.

#### **5.7 Non-Personally Identifiable Information**

We may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for various purposes, including (a) compliance with various reporting obligations, (b) for business or marketing purposes, or (c) to assist such parties in understanding our Clients', Users' and Visitors' interests, habits, and usage patterns for certain programs, content, services, and/or functionality available through the Service, all of the foregoing being subject to additional limits on use of your data as stated in this Policy.

#### 5.8 Law Enforcement, Legal Process and Compliance

We may disclose Personal Data or other information if required to do so by law or in the good faith belief that such action is necessary to comply with applicable laws, in response to a facially valid court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies. We may make such disclosures without notifying you, as we determine in our sole and reasonable discretion. We also reserve the right to disclose Personal Data or other information that we believe, in good faith, is appropriate or necessary to (a) take precautions against liability, (b) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (c) investigate and defend ourselves against any third party claims or allegations, (d) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, (e) protect our property or other legal rights, enforce our contracts, or protect the rights, property, or safety of others, or (f) comply with applicable law.

#### 5.9 Change of Ownership

Information about Users and Visitors, including Personal Data, may be disclosed and otherwise transferred to an acquirer, successor or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

## 6. Data Security

At Work Comp Saver, we take data security very seriously. We have taken steps to implement appropriate administrative, technical, and physical safeguards to prevent unauthorized access, use, modification, disclosure or destruction of the information you entrust to us. These measures have been audited and certified to industry standards. However, no security system is perfect, and due to the inherent nature of the Internet, we cannot guarantee that data, including Personal Data, is absolutely safe from intrusion or other unauthorized access by others. You are responsible for protecting your password(s) and other authentication factors and maintaining the security of your devices.

If you believe your Personal Data has been compromised, please contact us as set forth in the "**How to Contact Us**" section. If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

## 7. International Data Transfers – Not Applicable

Work Comp Saver only requests information from Clients or Users at this time from United States residents. If you live outside the United States, do not use or access this Site or the Service, or provide us with any Personal Data. As a result of not obtaining Personal Data from individuals outside the United States, we do not have compliance requirements under, nor do we comply with, the approved Standard Contractual Clauses approved by the European Commission (and the equivalent standard contractual clauses for the UK, where appropriate), or as set forth by the European Union ("EU").

For information about sharing your Personal Data, onward transfers, and your choices to opt out, please see Sections 5 and 10.2 of this Policy. Work Comp Saver does not process any "sensitive information" (as defined in the Terms); furthermore, the Terms forbid you to process any sensitive information in the Work Comp Saver Service.

# 8. Minors and Children's Privacy

Protecting the privacy of children is especially important. Our Service is not directed to nor intended for children under the age of 16, and we do not knowingly collect Personal Data from children under the age of 16. If you are under 16 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Data has been collected on the Service from persons under 16 years of age and without verifiable parental consent, then appropriate steps will be taken to delete this information. If you are a parent or guardian and discover that your child under 16 years of age has obtained an Account on the Service, then you may alert us at <a href="mailto:customercare@WorkCompSaver.com">customercare@WorkCompSaver.com</a> and request that we delete that child's Personal Data from our systems.

#### 9. Data Retention

We will retain your Personal Data for a period of time that is consistent with the original purpose of the data collection, or as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

For Client Data processed within the Service:

- The contents of closed Accounts are deleted within 90 days of the date of closure; and
- Server archival backups are kept for 90 days.

#### 10. Your Choices

#### 10.1 Your Rights with Respect to Information We Hold About You as a Controller

- Right to access: You have the right to know which data we hold about you (if any).
- **Right to data rectification**: You have the right to require corrections to your Personal Data in case they are inaccurate or incomplete.
- **Right to data deletion:** You have the right, under certain conditions, to request the deletion of your Personal Data, including in situations where the processing of your Personal Data is no longer necessary for the purposes for which it was collected, or if the processing of your Personal Data was based on your consent, you wish to withdraw your consent, and there are no other grounds for processing your Personal Data.
- Right to restriction of processing: You may also have the right to request to restrict the use of your Personal Data in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to data portability:** You have the right to transfer your Personal Data to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or on the basis of contract and by automated means.
- Right to object: You have the right to object to the use of your Personal Data in certain circumstances, such as when the processing is based on legitimate interest and in the use for direct marketing.
- **Right to complain:** You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use or share your information.

We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Service. If you wish to access

or amend any other Personal Data we hold about you, or to request that we delete or transfer any information about you that we have obtained from an Integrated Service, you may contact us as set forth in the "**How to Contact Us**" section below. At your request, we will have any reference to you deleted or blocked in our database.

#### In addition:

- You may update, correct, or delete your Account information and preferences at any time by accessing your Account settings page on the Service. Please note that while any changes you make will be reflected in active User databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.
- You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some of the features and functionality of the Service.
- You can choose not to provide optional profile information, such as your photo.
   You can also delete or change your optional profile information from your
   Account settings page.
- You can always choose not to fill in non-mandatory fields when you submit any form linked to our Site.

#### 10.2 Opting out

To comply with data protection regulations and ensure your privacy, Work Comp Saver provides you with the following options to opt out of different data processing activities:

- Marketing purposes. You may opt out of sharing your Personal Data with third-party service providers for advertising and marketing purposes, as detailed above in Section 5.5. You can submit an email request to opt out to the address provided in the "How to Contact Us" section below. Work Comp Saver will verify that the information you submit matches our records before fulfilling your request. Additionally, you can opt out by selecting your choice in the "Marketing preferences" tab on the Service.
- Commercial Communications. You may opt out of receiving newsletters and other non-essential messages by using the "unsubscribe" function included in all such messages or by sending an email to the address provided in the "How to Contact Us" section below. Please note that you will continue to receive essential notices and emails, such as Account notification emails (password change, renewal reminders, etc.), security incident alerts, security and privacy update notifications, and essential transactional and payment-related emails.
- Navigation Information. You may opt out from the collection of navigation information about your visit to the Site by Google Analytics by using the <u>Google</u> <u>Analytics Opt-out feature</u>. You can disable browser cookies before visiting our

Site. However, if you do so, you may not be able to use certain Site features properly.

Lastly, you can always opt out of certain communications by reaching out to <a href="mailto:customercare@WorkCompSaver.com">customercare@WorkCompSaver.com</a>.

#### 10.3 Information processed on Work Comp Saver Client's behalf

Work Comp Saver has no direct relationship with the Client's customers or third parties whose Personal Data it may process on behalf of a Client. An individual who seeks access, or who seeks to correct, amend, delete inaccurate data or withdraw consent for further contact should direct his or her query to the Client or User they deal with directly.

Work Comp Saver Clients can delete, amend or block access to Personal Data inside Work Comp Saver application, or by emailing <a href="mailto:customercare@WorkCompSaver.com">customercare@WorkCompSaver.com</a>.

## 11. California and Virginia Privacy Rights

Under the California Consumer Privacy Act of 2018 ("CCPA") and the Virginia Consumer Data Protection Act effective January 1, 2023 ("VCDPA"), California and Virginia residents have certain rights to understand and request that we disclose details about how we handle your Personal Data. To learn more about how we collect, use, disclose, and share your Personal Data, please see below.

## 11.1 Categories of Personal Data Collected

In the preceding twelve (12) months, we may have collected the following categories of Personal Data about California and Virginia consumers. We may collect this Personal Data directly from you, from third parties, and from your interactions with us. For additional details about the Personal Data that we collect and the sources from which we collect this Personal Data, please review Section 3 above. The Personal Data categories are:

- Identifiers, such as name, email address, address, and phone number;
- Commercial information, such as records of products or services purchased and other transactional data:
- Internet or other network or device activity details, such as technical data about your use of our Site and Service;
- Geolocation data, such as your approximate location based on IP address;
- Financial information, such as payment information or financial account numbers in the process of providing you with a subscription;
- Other Personal Data, in instances when you interact with us online, by phone or mail in the context of receiving help through our help desks or other support channels; participation in customer surveys or contests; or in providing the Service;
- Inferences drawn from any of the above information.

We may retain this Personal Data for as long as is needed for the purpose(s) for which it was collected and no longer than is relevant and reasonably necessary. Our retention periods vary based on business, legal, and regulatory needs.

# 11.2 Business and Commercial Purposes for Collection; Disclosures for a Business Purpose

We may collect all of the above categories of Personal Data to run our business and carry out our day-to-day activities, as described above in Section 4. We have disclosed each of these categories of Personal Data with our service providers for various business purposes, as described above in Section 5, during the preceding twelve (12) months.

# 11.3 Categories of Personal Data Sold or Shared for Cross-Context Behavioral Advertising

In the preceding twelve (12) months, we may have disclosed the above categories of Personal Data to third party advertising partners, such as in connection with our use of tracking technologies for cross-context behavioral advertising or by providing lists of email addresses for potential customers, so that we can reach you across the web with advertisements for our products and services. This may be considered "sharing" or a "sale" under the CCPA or the VCDPA. You can read more about our sharing and sales activities above in Sections 3 and 5. Work Comp Saver does not have actual knowledge that it sells or shares the Personal Data of consumers under 16 years of age.

#### 11.4 Your Rights

The CCPA and the VCDPA give you certain rights regarding the Personal Data we collect about you:

- Right to Know About Personal Data Collected, Disclosed, or Sold: You have the right to request to know what Personal Data we collect, use, disclose, share and sell about you.
- Right to Request Deletion of Personal Data: You have the right to request the
  deletion of your Personal Data collected or maintained by us as a business.
- Right to Opt Out of the Sale or Sharing of Personal Data: You have the right to opt out of the sale of your Personal Data by us as a business. Work Comp Saver shares Personal Data as described above, which may be considered a "sale" of Personal Data under the CCPA or the VCDPA.

If you wish to opt out of specific data processing activities, please refer to Section 10.2 entitled, "Opting out" of this Policy for detailed instructions. You may also opt out by broadcasting an opt-out preference signal like the Global Privacy Control (GPC), but please note that this signal will be linked to your browser only. If you wish to learn more about the GPC and how to use a browser or browser extension incorporating the GPC signal, you can visit the GPC website <a href="here">here</a>.

- Right to Limit the Use and Disclosure of Sensitive Personal Data: In some instances, we may use or disclose your Sensitive Personal Data for legitimate business purposes as outlined under the CCPA and VCDPA, and for any other purposes as set forth in Section 4, above.
- Right to Correct Inaccurate Personal Data: You have the right to request the
  correction of your Personal Data if it is inaccurate and you may submit a request
  as further described below.
- Right to Non-Discrimination for the Exercise of Your Privacy Rights: You
  have the right not to receive discriminatory treatment by us for the exercise of
  your privacy rights conferred by the CCPA and VCDPA.
- Conduct Data Protection Assessments: We will conduct data protection assessments as required under the VCDPA to process Personal Data for targeted advertising and sales purposes.

#### 11.5. How to Exercise Your Rights

- You can exercise your rights yourself or you can alternatively designate an
  authorized agent to exercise these rights on your behalf. Please note that to
  protect your Personal Data, we will verify your identity by a method appropriate to
  the type of request you are making. We may also request that your authorized
  agent have written permission from you to make requests on your behalf, and we
  may also need to verify your authorized agent's identity to protect your Personal
  Data.
- We do not provide any financial incentives tied to the collection, sale, or deletion of your Personal Data.

If you would like to make a request and exercise your rights described above, please contact us via email with your first name, last name, mailing address, email address and telephone number to <a href="mailto:customercare@WorkCompSaver.com">customercare@WorkCompSaver.com</a>. Please include "Privacy Rights" in the Subject line of your email.

# 12. Do Not Track (DNT) requests

Some internet browsers have enabled "Do Not Track" (DNT) features, which send out a signal (called the DNT signal) to the websites that you visit indicating that you don't wish to be tracked. Currently, there is no standard that governs what websites can or should do when they receive these signals. For now, we do not take action in response to these signals.

In the meantime, you may opt out of receiving interest based advertising from advertising networks by visiting the following websites:

http://www.aboutads.info/consumers and http://www.networkadvertising.org. This will opt you out of many – but not all - of the interest-based advertising activities in which we or third parties engage. Choices you make may be browser and device specific. If you

delete your cookies or use a different browser or a different computer or device, you may need to update your opt-out choices.

## 13. Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we reserve the right to update from time to time. If we modify this Policy, we will make it available through the Service and indicate the latest revision date at the bottom of this Policy. Any such changes will be effective upon posting. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

#### 14. How to Contact Us

Please contact us with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by email at <a href="mailto:customercare@WorkCompSaver.com">customercare@WorkCompSaver.com</a>. If you have any concerns or complaints about this Policy or your Personal Data, you may contact Work Comp Saver's Data Protection Officer by email at <a href="mailto:customercare@WorkCompSaver.com">customercare@WorkCompSaver.com</a>.

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