



## Privacy Policy for California Residents

Last updated: May 2024

This Privacy Policy and Notice for California Residents (“Notice”) supplements the information contained in [Foresters Enterprise Privacy Statement](#), [US Privacy Policy](#) and [Online Privacy Statement](#) and our California Privacy Notice and applies solely to consumers and customers of Foresters who reside in the State of California (“consumers” or “you”). The sections below describe the sources from which personal information was collected, the categories of personal information we may have collected from California consumers over the past twelve months, the business purpose for which it was collected, and the categories of third parties with we may have shared that information with.

You may find a copy of our California Notice of Collection here.

The California Consumer Protection Act (CCPA), as recently amended under the California Privacy Rights Act, may not apply to certain information. For example, it does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information that is specifically excluded from the scope of the California Consumer Protection Act including:
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, Gramm-Leach Bliley Act, or the California Financial Information Privacy Act.
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996.

### Information We Collect

We generally collect your personal information when you submit an application, when you provide it to your insurance agent or broker, when you provide it through other electronic or paper means, from your transactions and other interactions with us or when you visit our websites or social media pages.

We also use several technologies to collect information for business purposes about visitors to Foresters Sites. This may include information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly with an individual or with a device (“personal information”).

Over the last 12 months, we may have collected and/or disclosed the following categories of personal information (Personal Information):

- *Identifiers*, such as a name, postal address, unique personal identifier, online identifier, Internet Protocol address, phone number, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers

*Personal information*, means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

- *Characteristics of protected classifications* under California or federal law, such as race, gender identity, disability, age
- *Commercial information*, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- *Biometric information*, such as voiceprints
- *Internet* or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our internet website or application, or advertisement
- *Geolocation data*
- *Audio*, electronic, visual, or similar information
- *Professional* or employment-related information
- *Education* information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)
- *Inferences* drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
  
- *Sensitive Personal Information* including personal information that reveals:
  - Social security number, driver's license, state identification card or passport number
  - Customer account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account
  - A consumer's precise geolocation
  - A consumer's racial or ethnic origin
  - The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.
  - A consumer's genetic data
  - The processing of biometric information for the purpose of uniquely identifying a consumer
  - Personal information collected and analyzed concerning a consumers' health, sex life or sexual orientation

We only use or disclose Sensitive Personal Information for the following business purposes:

- To perform services or provide goods reasonably expected by an average consumer who requests those goods or services
- To help ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes

- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer’s current interaction with us when Personal Information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer’s experience outside the current interaction with us
- To perform services on our behalf, such as maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services
- To verify or maintain the quality or safety of a product or service that is owned, or controlled by us, and to improve, upgrade, or enhance the product or service that is owned or controlled by us

## **Sources from Which Personal Information is Collected**

We generally recollect your Personal Information when you submit an application, when you provide it to an insurance agent or broker, or when you provide it through other electronic or paper means, and from your transactions and other interactions with us.

During the normal course of our business, if you have either provided your consent to Foresters, a third-party, or if not otherwise prohibited by law, we may, from time to time, collect information from third parties such as:

- From your insurance agent, or broker to service your insurance product
- From consumer reporting agencies and financial institutions to process or administer the products or services you requested
- From any healthcare providers, clinics, the Medical Information Bureau, and other data brokers, service providers, or entities which may have records about you, or about your health
- Other sources may include insurance-support organizations, who may keep and disclose information as allowed by law

Please note these third parties from whom we obtain information may collect information and disclose it to other persons pursuant to their own privacy policies and practices.

We may also collect Personal Information when you use or interact with our websites, mobile applications or social media sites. For example, we may use cookies and other similar technologies, to collect information such as online identifiers including location data, your Internet Protocol (IP) Address, device or browser type, or information about how long you used the website and pages visited.

## **Use of Personal Information for Business Purposes**

We may use Personal Information for business or commercial purposes including:

- evaluating your eligibility for our products or services;
- administering our products and services
- product pricing, development, and quality assurance
- research studies and analytics
- legal and regulatory filings
- identity verification, fraud prevention, and information security
- marketing, advertising, promotions, and sales; and
- other operational purposes compatible with the uses related to your initial disclosure

## Disclosure of Personal Information

In the preceding 12 months, we may have disclosed your Personal Information to third parties, such as but not limited to:

- To comply with applicable legislation or regulation, or to respond to a subpoena, a court order, or to valid information requests from regulatory authorities
- To third parties, to help us prevent and detect fraud and suppress financial abuse, as permitted by law
- To Foresters subsidiaries and affiliates, if necessary to provide you with the product or service requested, and to better understand your needs and suggest catered products or services which could be good for you
- With Foresters employees, as required to fulfill their accountabilities. All Foresters employees are required to maintain the confidentiality of your personal information, and unauthorized disclosure or access is prohibited
- With independent agents or insurance brokers offering, advising you on, or servicing you with Foresters' products or services. Please contact your agent or broker for further details on their own privacy policies and practices
- Other third parties, including third party service providers, if you have either provided your consent to them or if not otherwise prohibited by law, for them to assist Foresters in providing you with the requested products or services, to improve their products offerings to Foresters, as well as their business development, for example, to build performance, customer demographic and behavioral insights. Third-party service providers may include but is not limited to:
  - Email and other internal operations or communications providers
  - Systems administration providers
  - Website operators
  - Payment card processors
  - Telephone and technical support providers
  - Printing, and mailing distribution providers
  - Data hosting, data storage, data processing and client relationship management service providers
  - Research and analytics providers
  - Professional advisors providing legal, consultancy, banking, insurance, audit and accounting services
  - Tax, regulatory and other authorities as required; and
  - Other third parties as required or permitted by law

We do not currently "sell" Personal Information, nor "share" it for cross-context behavioral advertising purposes, as defined under the CCPA, including the Personal Information of consumers under 16 years of age.

## Your Rights and Choices

California residents have specific rights regarding their Personal Information. This section describes those rights and explains how to exercise them.

**Right to Know:** You have the right to request what Personal Information we have collected, about you during the past twelve (12) months, including the categories of sources from which the Personal Information was collected, the business or commercial purpose for collecting Personal Information, the categories of third parties to whom the we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.

**Right to Delete:** You have the right to request us to delete any of your personal information that we hold, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may not be able to honor your request if retaining the information is necessary for us or our service provider(s), such as to:

- Complete the transaction for which we collected the personal information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Identify errors, repair or maintain systems, including errors that impair existing intended functionality.
- Comply with our legal and regulatory obligations.
- Enable internal and lawful uses of that information that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which you provided it.

**Right to Correct:** You have the right to request that we correct inaccurate personal information we have about you.

You may make any of the above requests twice within a 12-month period. When you make a request, you must: Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Making a consumer request does not require you to create an account with us. We will only use personal information provided in a consumer request to verify the requestor's identity or authority to make the request.

### **Marketing and Advertisement Materials Opt-Out:**

You may contact us at [privacy@foresters.com](mailto:privacy@foresters.com) or call us at 1 (800)-828-1540 should you no longer want to receive promotional materials from us. You may also wish to read our [Cookie Policy](#), to establish your cookies preferences, per our cookies management software, your browser setting, and policy.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your rights under this Notice unless permitted by law.

### **Exercising Your Privacy Consumer Rights**

To exercise any of the rights described above, or for any questions or concerns relative to our privacy policy and information practices, you can submit a consumer data request, or contact us, in one of the following ways:

1. Submit a Data Request Form. [Download and fill out the Data Subject Request Form](#). Return the completed form to us in one of the following ways:

via email at [privacy@foresters.com](mailto:privacy@foresters.com)

**via regular mail:**

Foresters Financial  
Attn: Chief Privacy Officer  
PO Box 179  
Buffalo, NY 14201

2. Call us toll free at 1-800-828-1540 Monday - Friday

To respond to a consumer request, we will need to verify your, or your authorized representative's, identity, or authority to make the request. Only you, or your authorized representative, may make a consumer request related to your personal information. You may also make a consumer request on behalf of your minor child. To do so, we may communicate with you to ensure some personal information you provide us with matches the information we currently have, or ask you specific questions relative to you, your products, or services or other benefits provided to you that only you could or should know. We will not be able to respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

## **Response Timing and Format**

We endeavor to respond to a consumer request within forty-five (45) days of receiving it. If we need more time, we will inform you, in writing, of the reason and extension period. Any disclosures we provide will only cover the 12-month period preceding receipt of the consumer request. If applicable, our response will also explain the reasons we cannot comply with a request. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We generally do not charge a fee to process or respond to your request unless it is excessive or repetitive. If we determine that a fee is necessary, we will tell you why and provide you with a cost estimate before we complete your request.

## **Changes To Our Privacy Notice**

We reserve the right to amend this Notice at our discretion and at any time. When we make changes, we will post the updated Notice on our Sites and update the effective date. Your continued use of our Sites after any changes to this Notice constitutes your acceptance of such changes.