



## EXPLAINING OUR PRIVACY POLICY

### About Us and Scope

This privacy policy, found below after this brief overview, applies to everyone who uses our website, mobile applications, and various other related platforms (the “Site(s)”), as applicable, that are operated on our behalf by our parent company, The Hartford Steam Boiler Inspection and Insurance Company, and its affiliates and subsidiaries (“HSB,” “we,” “us,” or “our”). Our goal is to make it clear and easy to read so that you know how we collect, use, and share your information and what rights you have with respect to your information.

### Contact Us

For any questions regarding any aspect of this privacy policy and our use of your personal data, you or your authorized agent may contact us using the contact information below:

#### **HSB Secure Services, Inc. (Home Systems Protection Plan by TrustedPlace)**

One State Street  
Hartford, CT 06102-5024

Email: [CustomerSolutions@TrustedPlace.com](mailto:CustomerSolutions@TrustedPlace.com)

Telephone: 1-866-237-3287

### Data We Collect and How We Use It

We collect your information in a few ways. Some information you give to us because you want to learn more about our products and services or you want to purchase those products or services from us. Some information we get from you because of our use of cookies and similar technologies. No matter what we collect from you, it will be collected, used and shared only in the ways and for the purposes described in our privacy policy.

### Use of Cookies

We use cookies. Some cookies stay on your device when you leave our Site(s) and some cookies are deleted when you leave our Site(s). Generally, we use cookies to improve our Site(s) for you and others. You can modify your browser settings in several ways in order to manage cookies to your liking. Depending on your settings, however, some changes may keep you from getting the most out of your use of our Site(s).

### Server Log Files

Server Log Files tell us about the traffic to our Site(s) – traffic from people like you browsing our Site(s) but also potential hackers. We may look at these files if we think someone is using our Site(s) fraudulently, or illegally. We won't look at these files to track you.

### **Web Analytics and Other Technologies**

Like cookies, we use web analytics tools to improve our Site(s) for you and others. If you want to manage cookies from these web analytics tools, please click on the link provided in the privacy policy below.

### **Sharing Your Personal Data**

The information that we collect from you may be used or shared for the reasons indicated here: to perform a contract or for some other business or commercial purpose; for our legitimate business interests; with your consent; or as may be permitted by law or required to comply with our legal obligation(s).

### **Transmitting Your Personal Data Externally**

Please be aware that data collected through the Site(s) may be transferred to, stored in, or processed in the United States or Europe, where our servers are located and our database is operated, or where our affiliates' or third-party service providers' offices, servers, or databases are located. We only share your data in order to fulfill the purposes for which you provide it to us (and which are listed above). Our internal staff sign contracts and strictly follow policies on protecting your information and making sure it doesn't get into the hands of someone who isn't allowed to have it. Likewise, our service providers are bound by contracts including restrictions on what they can do with the information we provide and security measures that they need to have and maintain to keep your information from use or access by others that are not authorized to use it or access it.

### **Security**

We take the security of your personal data seriously. We have appropriate security measures and procedures in place to protect your personal data. If you have reason to believe that your information is no longer secure, please contact us immediately.

### **Retention of Your Personal Data**

We only keep your information for as long as it is necessary to complete the purpose(s) for which you gave it to us or to comply with applicable laws and contractual obligations. This time period may vary based on the circumstances.

### **Your Rights**

You may have certain rights under the data privacy laws applicable to you. We have listed these rights in more detail in the privacy policy. We've also provided information about how to opt out of certain communications from us. If you would like to exercise any of your rights, please contact us.

## California Residents: Your Privacy Rights

Under the California Consumer Privacy Act of 2018 (“CCPA”), California residents have certain rights with respect to HSB’s collection, use, and sharing of their Personal Data. This section provides a brief explanation of those rights and how to contact HSB with any questions you may have.

### ABOUT US AND SCOPE

We are committed to protecting the privacy of your personal data. This privacy policy applies to the website located at [www.Trustedplace.com](http://www.Trustedplace.com) and related Site(s), (as applicable), and explains our policies and practices concerning collection, use, disclosure, and processing of your personal data collected through the Site(s) and by other related means (for example, through e-mail, phone calls and other communications).

### DATA WE COLLECT AND HOW WE USE IT

There are two categories of personal data that we may collect when you visit the Site(s): data collected automatically; and data that you provide voluntarily. Before we collect any of your personal data, you must affirmatively agree that we may collect, disclose, use or otherwise process your personal data in accordance with this privacy policy.

#### **Data collected automatically**

When you access the Site(s), we use automatic data collection technologies to collect your IP address, browser information (such as type, version, location and carrier), operating systems information, referral URL information, network information, user location, login dates and times, language preferences, access information, and information about how and when you use the Site(s) (e.g., page visits and views, link clicks, etc.). We collect this data through cookies, server logs, and other technologies, such as web analytics tools.

#### **Use of cookies**

While you are online, your computer saves “cookies.” A “cookie” is a small file, typically of letters and numbers, that is saved to your device or your browser’s memory. Cookies contain information about your visit to the Site(s) and serve to make our Site(s) more user-friendly, effective and secure.

Some of the cookies that we use are “session cookies,” which are automatically deleted as soon as you leave the Site(s). Other cookies, such as “persistent cookies”, remain on your device until you delete them and allow us to recognize your browser so that it loads our Site(s) faster the next time you visit. Cookies also allow us to improve the usefulness of our Site(s) and help us provide the best possible experience. The cookies on our Site(s) do not reveal your specific identity (e.g., your name), but may include information related to your device or location (e.g., your IP address). We perform anonymous statistical analyses of our internet presence (e.g., tracking the number of times you visit the Site(s), tracking the number of visitors to our Site(s), analyzing your interactions with our Site(s)), and we do not identify nor attempt to identify you personally in any such analyses.

You can change your browser settings so that you are notified when cookies are being used. You can also change your browser settings to allow cookies only once, refuse them completely or refuse them just in certain cases. You may also activate the automatic deletion of cookies when you close your browser. Deactivating cookies may restrict the Site(s) functionality and impact or impair your experience on the Site(s).

### **Server Log Files**

Data that your browser sends us is collected automatically and saved in server log files. They contain:

- Browser type, version, location and carrier
- Operating system used
- Referrer URL (the URL that the user comes from)
- Host name (network name) of the accessing computer
- Time of server request
- Mobile device ID and model (if applicable)

These data cannot be traced to individuals and we do not merge this data with other data sources. We reserve the right to review the information and report it to authorities (such as the police or public prosecutor's office) if there are circumstances which we reasonably believe indicate that our internet presence is being used fraudulently or illegally (for example, a hacking attack on our network).

### **Web analytics tools and other technologies**

We use web analytics tools and applications, such as Adobe Analytics or Google Analytics (the Universal Analytics library), to collect data so that we may better understand our traffic and make the Site(s) more user-friendly, efficient, and secure. Data collected automatically through Adobe Analytics or Google Analytics includes, IP addresses, user group and preference information, browser types, carrier and location, referring pages, pages visited and viewed, link clicks, login date and time spent on a particular Site(s). Adobe Analytics and Google Analytics may use cookies to collect and report data on an anonymous basis. For more information about Adobe Analytics and how to opt-out from specific Adobe Analytics cookies, please visit: <https://www.adobe.com/privacy/opt-out.html>. More information about Google Analytics and how to opt-out from specific Google Analytics cookies is available here: <https://support.google.com/analytics/answer/6004245?hl=en>

### **Data that you provide voluntarily**

#### ***Our relationship with you***

Our relationship with you (including the Site(s) that you use and the products or services you request) will dictate the types of personal data that we collect from you and our uses of such data. For example, we collect and use different personal data according to whether you are an insured policyholder, a claimant, a customer to whom we provide inspection services, a passive visitor of our Site(s), or a job applicant.

Where you provide personal data to us about other individuals (for example, where you are a customer to whom we provide services and you provide us with personal data about your employees or your own

customers), we will collect, use and disclose such personal data in accordance with this privacy policy. You must be authorized by the individual(s) to provide us with their personal data and it is your responsibility to refer such individuals to this privacy policy before providing us with personal data on their behalf.

### *Collecting and processing your personal data*

Personal data that we collect from you may include the following:

- Contact information, such as: first and last name, title, company name, e-mail address, phone number, location and postal address.
- Authentication and access information, such as: username, password and related security information.
- Policy and claim information (including materials submitted as part of a claim).
- Feedback, inquiries or other communications about the Site(s) and our products and services.
- Your preferences, such as: language, date format, notification method, postal code, and time zone.
- Your profile picture (if provided voluntarily).

We process your personal data in accordance with applicable laws and always for one or more of the following reasons:

- To enter into or perform a contract or for other business or commercial purposes: For example, we use your personal data to provide quotes; investigate claims; fulfill orders for products or services; communicate with you; respond to customer service requests; facilitate use of the Site(s), fulfill the reason for which you provided us your information, to improve our Site(s) and content; for testing, research, analysis or product development; etc.
- Our legitimate business interests: For example, we use your personal data to make improvements to our Site(s), our internal operations, our security efforts, and our products and services which benefit our customers.
- With your consent: For example, we will obtain your consent to process your personal data for purposes of sending you marketing or promotional material. Consent can be withdrawn in these circumstances by opting out of such communications at any time; provided, however, that it will not affect data processed prior to such withdrawal.
- As otherwise permitted by law or where required to comply with one or more of our legal obligations: For example, we may process your personal data for the establishment, exercise or defense of legal claims.

Personal data does not include information that has been aggregated or anonymized so that an individual cannot be re-identified by a third party ("Anonymized Data"). We may use Anonymized Data for the non-exhaustive purposes of improving our business operations, products, Sites, and Services or for our own research and development. We reserve the right to provide Anonymized Data to third parties for the purpose of evaluating and improving the Sites and Services or for other purposes that we deem reasonable or appropriate.

## SHARING YOUR PERSONAL DATA

We will keep your personal data confidential and only share it with others in furtherance of one or more of the purposes above.

### *Internal disclosures*

We share your personal data, on a confidential basis, with those departments and staff members (including departments and staff members of our affiliates or subsidiaries) who are responsible for the applicable use or processing activity and who have a need to know in order to perform their duties.

### *Disclosures to third parties*

We may share your personal data with our parent, Munich Re (and its subsidiaries), as well as third party service providers. A list of the categories of third party service providers to whom your data may be disclosed is provided below:

- Any agent or representative acting for you;
- Insurers or reinsurers;
- Third parties in the insurance distribution chain who we rely on to administer insurance, such as brokers, insurers, and other intermediaries;
- Actuaries;
- Auditors;
- Law firms and other advisors;
- Credit referencing, debt collection and fraud and prevention agencies;
- IT service providers, IT maintenance providers, and cloud service and hosting providers;
- Regulators and other applicable governmental bodies;
- Selected third parties in connection with any sale, transfer, or disposal of our business; or
- Any other person where necessary to perform a contract with you, to protect ourselves from risk, or to ensure regulatory compliance or good governance.

## TRANSMITTING YOUR PERSONAL DATA EXTERNALLY

Please be aware that data collected through the Site(s) may be transferred to, stored in, or processed in the United States or Europe, where our servers are located and our database is operated, or where our affiliates' or third-party service providers' offices, servers or databases are located. No matter where we may transfer, store or process your personal data, we will take appropriate measures to ensure that your personal data is protected in accordance with this privacy policy and all applicable data privacy and security laws. You may also request more information regarding our data transfers and the steps we take to safeguard your personal data by contacting us using the contact information set forth below.

## SALE

We do not and will not sell any of the personal data that we collect.

## THIRD PARTY SITES

For your convenience, our website may contain links (embedded or otherwise) to websites, online services, or mobile applications that are operated by third-parties ("Third Party Sites"). These Third Party

Sites are operated independently from our Site(s). We are not responsible for the content, security or privacy policies of any such Third Party Sites. You should review the specific privacy policies of those Third Party Sites to determine how they collect, protect, store, use, or otherwise process your personal data.

## SECURITY

We take the security of your personal data seriously. We have implemented appropriate technical and organizational security measures and procedures designed to protect against the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your personal data. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please notify us of the problem immediately by contacting us using the contact information provided below.

## RETENTION OF YOUR PERSONAL DATA

We will keep your personal data for as long as reasonably necessary to fulfill the purposes for which it was collected, in accordance with this privacy policy, and to comply with our legal and regulatory obligations. We have a detailed retention policy in place that governs how long we will retain your personal data. The exact time period for retention will depend on your relationship with us and the type of personal data collected, as well as applicable laws. If you would like more information regarding the periods for which your personal data will be stored, please contact us using the contact information below.

## YOUR RIGHTS

To the extent provided by law, you may have the right to:

- request access to your personal data;
- request updates or corrections to your personal data;
- request that we delete your personal data;
- request a disclosure of the personal data that we have collected from you;
- request transfer of your personal data;
- request we restrict access to your personal data;
- object to our processing of your personal data; or
- lodge a complaint with your local data privacy regulator.

The above rights may not apply in every circumstance or for every user. You can exercise your rights, or request more information about your rights, by contacting us using the contact information below. If we require further information from you to process your request or verify your identity, one of our staff will contact you. Verification of your identity may be through various means, including but not limited to verification against our own records, through use of a password-protected account that you maintain with us, or by other means we deem appropriate given the nature of the request and the personal data involved. In any case, we will attempt to respond to each of your requests not later than thirty (30) days after receipt of such requests or in such other timeframe as may be specified by applicable law. We will advise you in writing if we cannot meet your requests within this time limit.

Please note that there may be certain circumstances where we cannot comply with your request; such as where complying with it would mean that we couldn't comply with applicable legal or regulatory

requirements or an exemption under applicable law applies to the specific circumstances. In these instances, we will let you know why we cannot comply with your request.

In some circumstances, complying with your request may result in your insurance policy or services contract being cancelled or your claim being discontinued. We will inform you of this at the time you make such a request.

### *How to 'opt out' from marketing*

You have control over the extent to which we market to you and can request that we stop sending you marketing messages at any time. You can do this by either clicking on the "unsubscribe" button in any marketing email that we send to you or by contacting us using the contact information set forth below.

Please note that even if you opt out from receiving marketing communications, we may still send you service-related and administrative communications from which you cannot opt out without choosing to discontinue doing business with us.

## **California Residents: Your Privacy Rights**

Under the California Consumer Privacy Act of 2018 ("CCPA"), California residents have certain rights with respect to HSB's collection, use, and sharing of their Personal Data.

HSB collects various categories of Personal Data when you use the Site(s). A detailed description of the data HSB collects and how we use it is provided above (Section entitled - "***Data we collect and how we use it***"). You will find that the Section entitled "***Sharing your Personal Data***" describes the categories of third-parties with whom we share your Personal Data and what information may be shared under different circumstances.

We will not discriminate against you for exercising your rights under the CCPA. We will not: (i) deny goods or services to you, (ii) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, (iii) provide you a different level or quality of goods or services, or (iv) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services. We do not offer financial incentives associated with our collection, use, or disclosure of your personal information.

Separate from the CCPA, California's Shine the Light law gives California residents the right to ask companies what Personal Data they share with third parties for those third parties' direct marketing purposes. We do not disclose your personal information to third parties for the purpose of directly marketing their goods or services to you unless you request such disclosure.

If you have any questions regarding this privacy policy or how you may exercise your rights under California law, you may contact us using the contact information provided below or click [here](#).



## CHILDREN'S USE OF THE SITE(S)

The Site(s) are not directed to or intended for children. We do not seek or knowingly collect personal data from individuals under the age of 18 and we will delete such personal data from our databases as soon as practicable and in accordance with applicable law. For more information, please visit the Federal Trade Commission's website to learn more about the Children's Online Privacy Protection Act (COPPA).

## DO NOT TRACK DISCLOSURE

"Do Not Track" is a preference that you may be able to set on your browser (if supported) to opt out from online behavioral tracking. The Site(s) do not collect personally identifiable data about you as you move across different websites over time in order to provide targeted advertising and, therefore, do not respond to "Do Not Track" signals.

## OUR CONTACT INFORMATION

For any questions regarding this privacy policy, how to exercise your rights, or to inquire about our collection and use of your personal data, you may contact us by using any of the contact information below:

### HSB Secure Services, Inc. (Home Systems Protection Plan by TrustedPlace)

One State Street  
Hartford, CT 06102-5024

Email: [CustomerSolutions@TrustedPlace.com](mailto:CustomerSolutions@TrustedPlace.com)

Telephone: 1-866-237-3287

Your authorized agent may also make requests on your behalf. Please have your authorized agent contact us using the information above and to include the proper documentary evidence that demonstrates their authority to make such a request on your behalf. Such documentary evidence includes a signed permission by you or a properly executed power of attorney. Where you have provided signed permission to the authorized agent, we may take steps to verify your identity or directly confirm with you that you have authorized the agent to make a request on your behalf.

## CHANGES TO THIS PRIVACY POLICY

From time to time, we may need to make changes to this privacy policy (for example, as the result of changes to law, technologies, Site content or other developments). We will provide notice of such changes by posting them on the Site(s). You can also access [https://hsbfrontdoor.com/content/dam/munichre/hsbgrp/trustedplace/Privacy\\_Statement.pdf](https://hsbfrontdoor.com/content/dam/munichre/hsbgrp/trustedplace/Privacy_Statement.pdf) periodically to view the most recent version of this privacy policy.