

## PRIVACY NOTICE & COMPENSATION DISCLOSURE

### PURPOSE OF THIS NOTICE

At THE HOLMES ORGANISATION, we understand your concerns about privacy. We hope this notice, which describes our use and protection of nonpublic personal information ("customer information"), will help you understand how we treat the customer information we obtain from you or other sources in the course of providing you with our insurance products and additional services.

Furthermore, we wish to inform you that we do not share your personal information with any non-affiliated third parties for any purpose that is not specifically authorized by law unless we obtain your affirmative permission.

1. Whether you're doing business with us through an agent, broker, or our Web site, we want you to know that THE HOLMES ORGANISATION respects your privacy and protects your information.
2. We do not sell your customer information.
3. We do not share, loan or give customer information to persons, companies, or organizations outside of THE HOLMES ORGANISATION that would use that information to contact you about their own products and services.
4. We expect persons or organizations that provide services on our behalf to keep customer information confidential and to use it only to provide the services we've asked them to perform.
5. Within THE HOLMES ORGANISATION, we communicate regarding the need to protect your information to those individuals who may have access to it, and we've established physical, electronic, and procedural safeguards to protect customer information.

### PRIVACY POLICY STATEMENT

As a part of our normal operations we collect, and in some cases, disclose information about you. We encourage you to read the following Privacy Statement that contains information about THE HOLMES ORGANISATION policies regarding the collection, use, disclosure, and protection of your information.

If you are not comfortable with any of the terms or policies described in this Statement, we encourage you to send confidential correspondence through the postal service.

1. What information do we collect?
2. Personal, Financial and Product Information

We collect personally identifiable information in order to identify and register you as a HOLMES ORGANISATION customer. In addition, we collect personal, financial and product information in order to provide you with services tailored to your particular needs. By learning about you, THE HOLMES ORGANISATION can deliver more relevant protection and product offerings and thus offer you better insurance services and options.

The information we collect will vary depending upon the function or processes you select or request. Depending upon the function, product or process you select (for example, quote, request for proposal, e-mail, purchase), you may be required to provide information such as:

1. Name
2. Address
3. Birth date
4. Phone number
5. E-mail address
6. Policy(ies) Type(s) & Number(s)

7. Social Security Number
8. Driver's License Number, accident/violation history, information about vehicle operators, lien/lease holders, vehicle information, etc.

#### **Who Should Use Our Web Site?**

Our Web site is for insurance and financial products and services and is not intended for children. We offer insurance and financial products and services and thus do not market any products or services to children under the age of thirteen or knowingly collect any information from children under the age of thirteen. If we become aware that information is or has been submitted by or collected from a child under the age of thirteen, we will destroy this information.

#### **What kind of customer information do we have, and where did we get it?**

Much of the customer information we collect comes directly from you. When submitting your application or request for insurance or other products and services we offer, or in requesting an insurance quote, you may give us information such as your name, address, and Social Security number. We also keep information about your transactions with our affiliates, others, or us - for example, the types of products and services you purchase from us, premiums, policy account balances and payment history. We also may collect information from outside sources, including consumer reporting agencies and/or health care providers or reporting agencies such as the Medical Information Bureau (MIB). This information includes loss information reports, motor vehicle reports, credit reports, and medical information.

#### **Who collects this information?**

In order to better serve your particular needs, the information noted above is collected by THE HOLMES ORGANISATION, its agents, and other companies working on behalf of THE HOLMES ORGANISATION. In addition to collecting information from you, you should also know that, depending on the nature of your transaction, we may collect information from outside sources, such as loss information reports, motor vehicle reports, and credit reports. For property insurance, we may send someone to inspect your property and verify information about the value and condition of your property.

#### **How is this information used?**

The information you submit to us via our on-line forms and e-mail is used to provide you with the response or service you have requested.

We may also use this information to contact you about our products and services. If you do not wish to receive these communications, you can write us, e-mail us or simply reply to any e-mails you receive from our employees informing us of your desire to be removed from our mailing lists.

#### **Who has access to this information?**

In order to better serve your particular needs, THE HOLMES ORGANISATION, its employees, and certain companies working on THE HOLMES ORGANISATION behalf have access to this information. This information may also be disclosed to third parties without your consent if disclosure is necessary to comply with legal processes or to protect the rights, property, or personal safety of THE HOLMES ORGANISATION, its users or the public. We may also provide limited information about you to third parties without your permission when necessary or appropriate to service an insurance policy we have issued (e.g., inquiries from lien holders or additional insureds listed on the policy) or to address claims submitted under a policy we have issued.

In addition, we may, as permitted by law, provide information about you without your permission to certain persons or organizations, such as: your agent or broker; insurance support organizations; other insurance companies in order to perform their function in regard to an insurance transaction involving you (i.e. a claim); independent claim adjusters; businesses that conduct actuarial or research studies; regulatory and law enforcement authorities; or our affiliated companies, if any.

**What are your options regarding collection, use, and distribution of your information?**

Any information you submit to us via written applications, our Web site's on-line forms or e-mail is done so on a voluntary basis. When you access our site in this manner, the collection, use, and distribution of your information will be handled according to the terms and policies outlined in this Privacy Statement. If you object to the collection, use, and distribution policies outlined in this Privacy Statement, we ask that you do not submit information.

**What are your options regarding correction or storage of your information?**

You may either personally see, or obtain from us by mail, the information about you in our files. If you believe the information we have about you in our records or files is incomplete or inaccurate, you may request via telephone or a postal mail letter that we make any necessary additions or corrections or, to the extent that it is feasible, that we delete this information from our files.

**Links and Co-Branded Sites**

This Web site contains links to other sites. THE HOLMES ORGANISATION provides links to other sites as a convenience to persons who visit THE HOLMES ORGANISATION web site. If you choose to use the services provided by those sites, you may be asked by those sites to provide certain personally identifiable information (some of which may, on an individual or aggregated basis, be shared with THE HOLMES ORGANISATION). Please be aware that THE HOLMES ORGANISATION is not responsible for the privacy practices of those sites, even though THE HOLMES ORGANISATION name or logo may appear on those sites. We encourage you to be aware when you leave our site and to read the Privacy Statements of each and every Web site that you visit, as the privacy policy of those sites may differ from ours.

**COMPENSATION DISCLOSURE NOTICE**

The Holmes Organisation earns revenue in several ways for services rendered including commissions paid by an insurance company or provider for a risk, policy or service; fees paid by a client; investment income on premium deposits; and in the form of contingent, supplemental or bonus commissions paid by insurers based on volume, growth, profitability and/or other factors for business placed with that insurance company or provider. If you have any questions regarding the compensation earned by The Holmes Organisation on your account, please contact your agent.