



## **PRIVACY POLICY**

### **Introduction**

This website (the “Site”) is owned and operated by Confianza, Inc. (“we” or “us” ). We are committed to protecting the privacy of our visitors while they interact with the content and material on this Site. This Privacy Policy sets out how we use and protect any information that you give us when you visit this Site, in online or offline business interactions, or in any other business communications. This Privacy Policy applies to this Site only. It does not apply to other websites to which we link. Because we may gather certain types of information about visitors to this Site and our customers, business partners and others, we want you to understand what information we collect about you, how we collect it, how that information is used, and how you can control our disclosure of it.

By using this Site and providing us with your information you agree to this Privacy Policy. If you do not agree with this Privacy Policy, please do not use the Site.

When the term “you” is used in this Privacy Policy it refers both to an individual visitor to this Site or other person that provides information to us as an individual and to any entity to which you are a part of if you visit this Site or provide us with information on behalf of a business entity.

### **Confianza Privacy Policy Statement**

As a provider of services and solutions to the insurance industry, we are keenly aware of our duties with regard to the handling, storage and processing of personal information that is provided to us. We are committed to protecting the privacy of confidential and personal information of our customers and others. Our policy is to comply with all applicable privacy and data protection laws and regulations, and to preserve the confidentiality of all personal information subject to any legal obligations that we are required to comply with. This Policy is intended to summarize our data protection practices generally, and to advise our customers, visitors to this Site and other persons we deal with about our privacy policies that may apply to them.

## **What Information do We Collect?**

When contacting us through this website, you may be asked to enter your name, e-mail address, job title and phone number. We collect personally identifiable information when you choose to use certain features of this Site, including (i) consenting to receive email or text messages about upcoming promotions or events, (ii) consent to receive email, (iii) participating in our forum, (iv) commenting on articles, and others. The information we collect may include details about the computer, mobile phone or other device you use to access the Site (such as browser type, operating system and IP address), referring URLs and information on your interaction with this Site.

We may retain information provided by you, including personal information, for as long as necessary to comply with our legal obligations, or to achieve the purposes for which the information was originally collected and for the purposes described in this Privacy Policy. If you wish to obtain more details on our information practices, please contact us via e-mail at [info@confianzaus.com](mailto:info@confianzaus.com).

## **How Do We Use the Information That You Provide to Us?**

We use the information you provide us where it is in our legitimate interest to do so for the following purposes:

- To provide you with services.
- To contact you and respond to your requests and inquiries.
- To contact you regarding matters that are relevant to the information we collect from you.
- To personalize your visit and use of this Site and to assist you while you use this Site.
- To carry out, monitor and analyze our business and the operation of this Site.
- To contact you regarding matters that may be of interest to you, unless you tell us that you prefer not to be contacted.
- To enter and carry out contracts of various types.
- To comply with applicable laws, regulations, guidance, or contractual obligations that we may be subject to.
- To bring legal action against anyone that violates our policies regarding the use of this Site.

## **Security**

We are committed to protecting the information we receive from you. We take appropriate security measures to protect your information against unauthorized access to, or unauthorized alteration, disclosure or destruction of data. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we maintain appropriate physical, electronic and managerial procedures to safeguard and secure the information and data stored on our system. While no computer system is completely secure, we believe the measures we have implemented reduce the likelihood of security problems to a level appropriate to the type of data involved.

Please note that we cannot guaranty that our safeguards will always work. We cannot enforce or control the security of devices and networks that you may use to submit information to us. We are not responsible for the disclosure or interception of your information before we receive it.

By using this Site and thereby agreeing to this Privacy Policy, you agree that no data transmitted over the Internet is completely secure, and that any information you transmit to us is at your own risk. We cannot guarantee or warrant the security of any information you provide to us.

### **Do We Disclose Any Information to Outside Parties?**

We do not sell, trade, or otherwise transfer your personal information to any outside parties except under very limited circumstances. Those circumstances include disclosures to data processors and other trusted third parties who assist us in operating this Site, conducting our business or providing services to you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

We use third-party web analytics services such as Google Analytics to help us analyze how visitors use this Site. We may permit these third parties to directly access the Site, use their own technology (such as cookies or web beacons), and collect information about you on our behalf. The information these third parties collect may track information about your online activities over time and across different websites. Your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. However, there is no consensus among industry participants as to what "Do Not Track" means in this context. Like the operators of many websites, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track" visit <http://www.allaboutdnt.com>.

We will notify you when any personally identifiable information you provide to us might be provided to any third party for any reason other than those set forth in this Privacy Policy, except to the extent we are prohibited by doing so by applicable law.

We do de-identify and aggregate information to improve the design and function of this Site and for our internal business and administrative purpose. We may also share de-identified aggregated data with third parties for any purpose so long as it contains no personally identifiable information.

You may at any time request a list of third parties to whom we may have provided personal information you give to us by contacting us via e-mail at [info@confianzaus.com](mailto:info@confianzaus.com) or calling us at (505) 335-1974.

### **What Are Cookies?**

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites.

Unless you have adjusted our browser setting so that it will refuse cookies, this Site will issue cookies when you visit. Cookies are not strictly necessary to use this Site. You may reset your browser to refuse all cookies or to allow your browser to alert you when a cookie is set. However, certain parts of this Site may function differently or not as well. For information on managing cookie preferences you should use the help menu of your web browser or visit the customer support sections of your web browser.

### **How Do We Use Information We Collect from Cookies?**

As you use this Site, the site uses its cookies to differentiate you from other users. In some cases, we also use cookies to prevent you from seeing unnecessary advertisements or requiring you to log in more than is necessary for security. Cookies, in conjunction with our web server's log files, allow us to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Cookies do not allow us to gather any personal information about you and we do not generally store any personal information that you provided to us in your cookies.

### **How Can You Access and Update Your Personal Information and Preferences?**

We provide mechanisms for updating and correcting your personal information for many of our services. If you are a registered user, you may access and update your registration information and your preferences to receive email or other communications from us by sending an email to [info@confianzaus.com](mailto:info@confianzaus.com).

## **How Can You Unsubscribe from Email and Other Communications**

If you would like to unsubscribe from emails and other communications from us, you may do so at any time. The footers of our emails will have a tab you can click to unsubscribe. You may also contact us directly to unsubscribe by sending an email to [info@confianzaus.com](mailto:info@confianzaus.com) or calling us at (505) 335-1974. We will make commercially reasonable efforts to implement your opt-out requests promptly, but you may still receive communications from us for up to ten business days as we process your request.

## **How Can you Withdraw Consent to the Use of Your Personal Information**

You may withdraw your consent for our collection, use and disclosure of your Personal Information at any time subject to our legal or contractual restrictions and reasonable advance notice. As such, we may continue to collect, use and disclose your personal information as may be required to continue to provide you with services we are contractually obligated to provide or to enforce any contractual obligations you have to us. If you refuse to provide us with information we need or later contact us to withdraw your consent to use and disclose your personal information, we may not longer be able to provide you with our services. If you do wish to withdraw your consent you may do so by contacting us by email at [info@confianzaus.com](mailto:info@confianzaus.com) or by calling us at (505) 335-1974.

## **Children**

In order to respect the privacy of minors, we do not knowingly collect, maintain, or process personal information submitted online via this Site by anyone under the age of 18. If you are not 18 or older, you are not authorized to use this Site. Parents should be aware that there are parental control tools available online that can be used to prevent children from submitting information online without parental permission or from accessing material that is or may be harmful to minors.

## **Your California Privacy Rights**

Under California Civil Code Section 1798.100 (California Consumer Privacy Act), California residents may have certain data protection rights regarding their Personal Information. These rights which may be subject to limitations and/or restrictions include: (i) the right to disclosure, deletion, access, and nondiscrimination; and (ii) the right to opt out of having your Personal Information shared or sold. The firm does not sell or share your Personal Information with third-party companies for their direct marketing purposes without your consent. To exercise your rights under the California Consumer Privacy Act, please send us your request using the "Contact Us" section below.

The following are categories of Personal Information defined under the Act we may collect, receive, or maintain in the course of administering firm business or receive from a client in the course of providing legal services: Identifiers, Personal information described in the California

Customer Records statute (Cal. Civ. Code § 1798.80(e)), Protected classification characteristics under California or federal law, Commercial information, Biometric information, Internet or other electronic network activity, Geolocation data, Sensory data, Professional or employment-related information, Non-public education information, and inferences drawn from other personal information.

### **Your European Union (EU) Data Protection Rights**

The General Data Protections Regulations (GDPR) is a law in effect in the European Union (EU) aimed at protecting the personal data of residents of the EU. Residents of the EU who visit this Site should be aware of the following:

According to the European Commission, personal data includes any information relating to an individual, whether it relates to his or her private, professional or public life. It can be anything from a name, home address, photograph, email address, bank details, posts on social media sites, medical information or a computer's IP address. Among the things considered to be personal data under the GDPR are the following:

- Identification information: name, telephone, physical and email address and government ID numbers
- Website data: location, IP address, cookie history and RFID tags
- Health, mental and genetic data
- Biometric data
- Racial, cultural or ethnic data
- Political opinions
- Sexual orientation
- Tagged photos

Under EU data protection laws, individuals may have certain data protection rights which may be subject to limitations and/or restrictions and which includes the right to request access to and, rectification or erasure of your personal information and the right to ask us to restrict the processing of your personal information. You have the right to object to processing of your personal information where carried out for our legitimate interest or direct marketing.

If you wish to exercise your right to withdraw your consent to our use and storage of your personal information please send us your request using the "Contact Us" section below.

Individuals may also have a right to lodge a complaint about the processing of their Personal Information with their local data protection authority.

### **Links to Other Websites**

Our website may contain links to enable you to visit other websites of interest easily. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites.

### **Changes**

We reserve the right, in our discretion, to change, modify, add, or remove portions of this Privacy Policy at any time and from time to time, without prior notice to you. All revisions will be posted on this page. We urge you to review the Privacy Policy for changes each time you visit this Site. Your continued use of this Site means that you accept any changes.

### **Contact Us**

If you have any questions about this Privacy Policy or our use of your personal information, please contact us by email at [info@confianzaus.com](mailto:info@confianzaus.com) or by mail to Confianza, Inc. at 7901 N. Tamiami Trail, Suite 205, Sarasota, FL 34243.

Last Updated: February 5, 2022