



Privacy Notice

Revised 05-04-2023

Your privacy is important to us. This privacy notice describes how Optifino, Inc. (“**Optifino**,” **we**,” “**us**,” or “**our**”) collects, processes, maintains and discloses your Personal Information when you use our website and online services (collectively, the “**Website**”), interact with us over the phone or in person, or otherwise provide us with your Personal Information, including through our third-party agents.

Optifino provides this Website in order to facilitate the advice, application, and purchase of life insurance policies through insurance agents, (the “**Services**”). The Website also provides information about us and our Services. Your use of the Website is governed by the Terms of Use.

I. Information We Collect

“Personal Information” is information that can be used to identify someone or relates to an identifiable individual. We may collect the following categories of Personal Information about you:

If you use the Website, contact us by email or telephone, or otherwise provide us with your Personal Information, we may collect:

- **Contact information**, such as your full name, email address, and telephone number.
- **Professional information**, such as your business affiliation.
- **Internet activity information**, such as your device and browser type, operating system, Internet Protocol (“IP”) address, mobile network carrier, device and advertising identifiers, date and time of visit, Website features viewed, and the third-party site your device was accessing before coming to the Website.

If you submit an application for insurance to us, including through your third-party agent, we may collect:

- **Information requested on applications and other forms**, such as your full name, email address, phone number, address, date of birth, Social Security number, family and household information, and financial and credit information.
- **Professional information**, such as your business affiliation, employment history, and salary.



- **Health Information**, collected with your permission, such as medical history, prescription drug history, and other health-related information.

If you apply to enter or enter into a Producer Agreement with us, we may collect:

- **Contact information**, such as your full name, email address, and telephone number.
- **Professional information**, such as your business affiliation.
- **Financial and commercial information**, such as your credit, debit, or financial account numbers.
- **Identification information**, such as your date of birth, Social Security number, drivers' license, and other identification information.
- **Internet activity information**, such as your device and browser type, operating system, Internet Protocol ("IP") address, mobile network carrier, device and advertising identifiers, date and time of visit, Website features viewed, and the third-party site your device was accessing before coming to the Website.

We may collect your information in several ways, including:

- **From you.** We may collect Personal Information that you provide when you use the Website, fill out an application form, or otherwise interact with us.
- **From third parties.** We may collect information about you from third parties, such as agents, your financial institution and credit reporting agencies. We may also invite you to opt-in to us collecting additional information about you from third parties for other purposes.
- **Cookies and similar technologies.** We use cookies and similar technologies to automatically gather certain information about you. To learn more about these technologies and our use of them, please see the Use of Website Data | Cookies and Similar Technologies section below.

We may also use any information that we collect on an aggregate or anonymous basis (such that it does not identify an individual or household) for various business purposes, where permissible under applicable laws and regulations.

II. Use of Information

We may use your Personal Information for several purposes, including to:

- Provide you with access to the Website;
- Provide authorized users with access to accounts;
- Contact you regarding your account, policies, coverages, and other products and services you obtain from us;



- Perform our Services;
- Contact and provide you with information, newsletters, and promotional materials from us or on behalf of our partners and affiliates regarding other products and services that may be of interest to you;
- Respond to your requests and inquiries;
- Secure the Website, our networks, and databases, and prevent fraud;
- Execute transactions;
- Verify information;
- Process your payments, assess and administer your policies and coverages, assist in the processing of claims;
- Develop new products and services, and improve our existing products and services;
- Address problems with, and review the usage and operations of, our Website and business;
- Automatically receive and track website data;
- Enhance the security of the Website;
- Perform analytics concerning your use of the Website;
- Respond to law enforcement requests and as required by applicable law, court order, and governmental regulations;
- Comply with and enforce applicable legal requirements, industry standards and our policies; and
- As otherwise described to you at the point of data collection and in this privacy notice

III. Disclosure of Information

We do not disclose, share, sell, or otherwise transfer your information to, or with, any third parties, except as provided below.

- **Third Party Agents.** We may share your Personal Information with insurance agents that contract with Optifino to provide you with our policies and other services.
- **Service Providers | Insurance Companies.** We may disclose your information to third-party service providers and insurance companies, such as insurance carriers, banks, law firms, payment processors, Website developers, and hosting providers, that contract with Optifino or you to develop and execute transactions, perform background checks, provide financing, review policy information, broker or issue policy contracts, perform custodial or administrative functions, detect or prevent criminal activity, fraud, material



misrepresentations or material nondisclosures in connection with insurance transactions, and perform other functions in connection with your insurance transactions. We give these third-party service providers and insurers only the information they need to perform the specific services we have requested, and we require them to protect and keep confidential your information (except as otherwise permitted by law). Although we use reasonable precautions to ensure that service providers protect your information, we cannot guarantee that they will protect your information to the same extent as Optifino.

- **Partners | Promotions.** We will share the information we collect from and about you with third parties as necessary to provide you with a product or service you requested through a partnership or promotional offering made by a third party or Optifino.
- **Government and Regulatory Authorities; Law Enforcement.** We share personal information with law enforcement and other governmental and regulatory authorities as required by law.
- **In Response to Valid Administrative or Judicial Orders.** We share Personal Information in response to a facially valid administrative or judicial order, including a search warrant or subpoena.
- **Sale, Transfer, or Merger.** In the event of a proposed or consummated sale, transfer, merger or consolidation of all or part of the business of Optifino, we may share your information as reasonably necessary to enable the recipient to make business decisions about the purchase, transfer, merger, or consolidation, provided the recipient agrees not to disclose the information except as permitted by law.
- **As Otherwise Permitted or Required by Law.** Without limiting the foregoing, we reserve the right to disclose or report your information in limited circumstances where we believe in good faith that such disclosure or reporting is required by law (*e.g.*, to cooperate with regulators or law enforcement officials), or as needed to perform credit/authentication checks, to protect the integrity of our Website, to investigate and resolve disputes, to fulfill your requests, or for our legitimate business purposes.
- **Your Authorization.** We may share your information to the extent expressly authorized by you.

In addition, we may share anonymous or aggregated information with third parties to help deliver products, services, and content that are tailored to the users of the Website and for other legitimate purposes.

IV. Use of Website Data | Cookies and Similar Technologies

When you visit or interact with the Website, we and other companies we work with may deploy and use cookies and similar technologies (such as web beacons, local shared objects and other tracking technologies) for a variety of reasons, including to collect Website data in order to



enhance the security of the Website, perform analytics concerning your use of the Website, and comply with and enforce applicable legal requirements, industry standards, and our policies.

We may also use Google Analytics cookies to collect information about how visitors use the Website. These cookies collect information in the aggregate to give us insight into how the Website is being used. We anonymize IP addresses in Google Analytics, and the anonymized data is transmitted to and stored by Google on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your anonymized IP address with any other data held by Google. For an overview of these Google Analytics cookies, please visit [this link](#). You may install a Google Analytics Opt-out Browser Add-on by going to [this link](#).

You may have other means of controlling the use of cookies and similar technologies on this and other websites. You may be able to instruct your browser or mobile device to warn you each time a cookie is being sent, or to reject all or certain kinds of cookies. Typically, you can do this by changing the privacy settings on your internet browser or device. However, if you choose to reject cookies, the Website may not function properly, and some Website services may be diminished.

Do Not Track

Certain web browsers may allow you to enable a "do not track" option that sends signals to the websites you visit indicating that you do not want your online activities tracked. This is different from blocking cookies because browsers with the "do not track" option selected may still accept cookies. Right now, there is no industry standard for how companies should respond to "do not track" signals, although one may be adopted in the future. We do not respond to "do not track" signals at this time. If we do so in the future, we will modify this privacy notice accordingly. More information about "do not track" is available at www.allaboutdnt.com.

V. Links to Third-Party Websites

Optifino may provide links to websites that are owned or operated by other companies ("**third-party websites**"). When you use a link on the Website to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use, and security practices of the linked third-party website before providing any information on that website. We make no warranties or representations about third-party websites.

VI. Security

We use reasonable safeguards to protect and limit access to Personal Information. However, no transmission or storage of data can be guaranteed to be 100% secure. As a result, despite our



reasonable efforts to protect your information, we cannot ensure the security of any information you provide to use, or we collect about you. Please also note that information you send to us electronically may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us.

We also restrict access to Personal Information to our employees and others who we know must use it to provide our products and services. Their use of Personal Information is limited by law, our employee code of conduct, and written agreements where appropriate.

VII. International Users

The website is intended only for use in the United States, and we may transfer your Personal Information to the United States and process it there. The laws of the United States may not be as protective of your information as the laws of your country. By using the Website, you agree and consent to the transfer of your Personal Information to the United States.

VIII. Children's Information

Our Website is intended for general audiences and is not directed to, nor do we knowingly collect information directly from, children under the age of 13. If you are a parent or legal guardian of a child under 13, we encourage you to monitor your children's use of the Internet. If we become aware that we have received the Personal Information of a child under 13 without parent or guardian authorization, we will take reasonable measures to delete such information.

XI. Privacy Notice Changes

We may change this privacy notice from time to time. When we do, we will let you know by appropriate means such as by posting the revised notice on this page with a new "Last Updated" date. Any changes to this privacy notice will become effective when posted unless indicated otherwise.

XII. Contact Us

If you have any questions, comments, concerns, or compliments about this privacy notice, please contact us: contact@optifino.com