

Spencer Insurance Agency, Inc.
Privacy Policy Notice effective July 1, 2020

I. Introduction:

As a current customer of Spencer Insurance Agency, Inc., we would like to take this opportunity to both thank you for your business and to share with you the importance our agency places upon protecting the privacy of information we gather from you in accordance with applicable state and federal laws.

Spencer Insurance Agency, Inc. is a member of the financial services industry and, as such, our agency has been and continues to be subject to federal and state privacy laws regarding the collection and exchange of your information. The following is Spencer Insurance Agency, Inc.'s privacy policy regarding the customer information we collect. Contained in this privacy policy you will find (1) an explanation of the types of information Spencer Insurance Agency, Inc. collects from our clients and the means used to collect such information, (2) an explanation of how Spencer Insurance Agency, Inc. shares the information collected from our clients, and (3) an explanation of how Spencer Insurance Agency, Inc. protects client information.

II. Information we collect and the means used to collect:

Spencer Insurance Agency, Inc. collects information about our customers that is necessary to provide those services usual and customary to independent insurance agents. Spencer Insurance Agency, Inc. collects this necessary information from the following sources:

- Information we receive from you on applications or other data gathering forms, this information may include, but is not limited to, your name, address, and date of birth.
- Information about our clients' transactions with us; this information may include, but is not limited to, claims and payment history.
- Information we receive from a consumer-reporting agency; this information may include, but is not limited to, a driving record or insurance score report.

To collect customer information from the above-stated sources, Spencer Insurance Agency, Inc. may use the following means of communication to gather information: written, in-person, telephone, facsimile, electronically, and online.

III. How we share client information with non-affiliated third parties:

We don't share information about our customers or former customers with non-affiliated third parties other than as permitted or required by law. For example, Spencer Insurance Agency, Inc. may share all of the information listed above with non-affiliated third parties for, including but not limited to, the following reasons:

- Information that is necessary to service or process the insurance needs of our clients, in a manner that is consistent with the usual and customary services provided by independent insurance agents. Such usual and customary services or processes provided by Spencer Insurance Agency, Inc. to its customers include but are not

limited to underwriting, shopping the renewal, rating, placement, and providing quotes for insurance that is germane to the coverage the customer places with our agency.

- Information that is necessary to protect the confidentiality or security of our client's records
- Information that is necessary to resolve client disputes or inquiries
- Information that is required by individuals or entities that are assessing our legal compliance.
- Information that is required for Spencer Insurance Agency, Inc. to comply with the law.
- To an actuarial or research organization for the purpose of conducting actuarial or research studies
- Information that is necessary to protect against or prevent fraud, unauthorized transactions, claims, or other liability

IV. How we share client information with affiliated parties:

We do not share client information with any affiliate.

V. Our practices regarding information confidentiality and security:

We maintain physical, electronic, and procedural safeguards to guard your information. These safeguards include but are not limited to the following:

- We restrict access to nonpublic personal information about our clients and former clients to those employees who need to know that information in order to assist in providing services or products to the customer.
- We will punish any employees who impermissibly share client information.
- We use a secure Internet and e-mail provider to protect the confidentiality of electronic communications.

VI. Reservation of the right to disclose information in unforeseen circumstances:

In connection with the potential sale or transfer of its interest, Spencer Insurance Agency, Inc. and its affiliates reserves the right to sell or transfer your information (including but not limited to your address, name, age, sex, zip code, state, and country of residency and other information that you provide through other communications) to a third party entity that (1) agrees to be Spencer Insurance Agency, Inc.'s successor in interest with regard to the maintenance and protection of the information collected; and (2) agrees to the obligations of this privacy statement.

Spencer Insurance Agency, Inc. appreciates your business and in order to continue building upon that relationship we believe it is necessary, not only from a legal standpoint, but also as a sound business practice that our customers understand the care our agency uses in handling your information. Spencer Insurance Agency, Inc. will continue to monitor the effectiveness of this privacy policy.