

# Hartshorne & Curley Insurance, Inc. Privacy Policy Notice (Ed. 1/2018)

We take the privacy of our customers and potential customers extremely seriously. We do not share any of your information with anyone other than the purpose of securing insurance policies. We have taken extensive precautions to safeguard any and all information that is provided us. We go above and beyond all Federal and State regulations when it comes to protecting your information. We do not track data on our website. External links are provided as a public service only.

## PURPOSE OF THIS NOTICE

Title V of the Gramm-Leach-Bliley Act (GLBA) and the laws of the State of Massachusetts, generally prohibit us from sharing nonpublic personal information about you with a third party unless we provide you with this notice of our privacy policies and practices describing the type of information that we collect about you and the categories of persons or entities to whom that information may be disclosed. In compliance with the GLBA and the laws of this State, we are providing you with this document, which notifies you of the privacy policies and practices of Hartshorne & Curley Insurance, Inc.

#### **OUR PRIVACY POLICIES AND PRACTICES**

#### Sources From Which Non-Public Information is Collected

We may collect non-public personal information about you from several sources including your application for insurance and other forms, transactions with us, our affiliates or others, medical records or medical professionals, governmental or independent reporting agencies, personal interviews with neighbors, friends, associates or other acquaintances. Unless it is specifically stated otherwise in an amended Privacy Policy Notice, no additional information will be collected about you.

#### Information we may disclose to third parties:

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. We may disclose all information we collect to the following types of third parties for the following purposes: a third party if the disclosure will enable that party to perform a business, professional or insurance function for us; to an insurance institution, agency, company, or credit reporting agency in order to detect or prevent criminal activity, fraud or misrepresentation in connection with an insurance transaction; glass companies, auto body shops, and car rental agencies to facilitate insurance coverages and benefits; to an insurance institution, agent, or credit reporting agency for either this agency or the entity to whom we disclose the information to perform a function in connection with an insurance transaction involving you; to a medical care institution or medical professional in order to verify coverage or benefits, inform you of a medical problem of which you may not be aware, or conduct an audit that would enable us to verify treatment; to an insurance regulatory authority, law enforcement, or other governmental authority in order to protect our interests in preventing or prosecuting fraud, or if we believe that you have conducted illegal activities; to a group policyholder for the purpose of reporting claims experience or conducting an audit of our operations or services; or to an actuarial or research organization for the purpose of conducting actuarial or research studies. In addition to those circumstances listed above, and unless you tell us not to, we may disclose certain information about you to third parties whose only use of the information will be for purposes of marketing a product or service. Under no circumstances will we disclose for marketing purposes any medical information; information relating to a claim for benefit or, a civil or criminal proceeding involving you; personal information relating to your character, personal habits, mode of living or general reputation and/or affiliates with whom we share certain information protected by the Fair Credit Reporting Act, unless you tell us not to.

## Information we can share with our affiliates, unless you tell us not to:

Unless you tell us not to, we may share with our affiliated companies information about you, including: information we obtain from your insurance application, such as your income or your marital status; information we obtain from a consumer report, such your credit score or credit history; information we obtain to verify representations made by you, such as your open lines of credit; and information we obtain from a person regarding its employment, credit, or other relationship with you, such as your employment history.

## Our affiliated companies who may receive this information are:

Financial service providers, such as: mortgage lenders and brokers, insurance companies and brokers, lienholders, and insurance regulatory agencies in connection with the regulation of our business. Non-financial companies, such as: governmental or law enforcement agencies to protect our legal interests or in cases of suspected fraud or illegal activities; authorized persons as ordered by a subpoena, warrant or other court order or as required by law. We do not sell or share your information with anyone outside Hartshorne & Curley Insurance, Inc. for marketing purposes. We respect your privacy and confidentiality. We take physical, administrative and electronic steps to protect your personal information. We restrict access to your information to necessary personnel to provide your insurance services.

# Your right to access and amend your personal information:

You have the right to request access to the personal information that we record about you. Your right includes the right to know the source of the information and the identity of the persons, institutions or types of institutions to whom we have disclosed such information within 2 years prior to your request. Your right includes the right to view such information and copy it in person, or request that a copy of it be sent to you by mail (for which we may charge you a reasonable fee to cover our costs). Your right also includes the right to request corrections, amendments or deletions of any information in our possession. The procedures that you must follow to request access to or an amendment of your information are as follows: To obtain access to your information: You should submit a request in writing to Privacy Act Coordinator, Hartshorne & Curley Insurance, Inc., PO Box 490, 35 Albion Street, Wakefield, MA, 01880. The request should include your name, address, social security number, telephone number, and the recorded information to which you would like access. The request should state whether you would like access in person or a copy of the information sent to you by mail. Upon receipt of your request, we will contact you within 30 business days to arrange providing you with access in person or the copies that you have requested. To correct, amend, or delete any of your information: You should submit a request in writing to Privacy Act Coordinator, Hartshorne & Curley Insurance, Inc., PO Box 490, 35 Albion Street, Wakefield, MA, 01880. The request should include your name, address, social security number, telephone number, the specific information in dispute, and the identity of document or record that contains the disputed information. Upon receipt of your request, we will contact you within 30 business days to notify you either that we have made the correction, amendment or deletion, or that we refuse to do so and the reasons for the refusal, which you will have an opportunity to challenge.

#### Our policy regarding dispute resolution:

Any controversy or claim arising out of or relating to our privacy policy, or the breach thereof, shall be settled by arbitration in accordance with the rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction thereof.

## Reservation of the right to disclose information in unforeseen circumstances:

In connection with the potential sale or transfer of its interests, Hartshorne & Curley Insurance, Inc. and its affiliates (if any) 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) concentrates its business in a similar practice or service; (2) agrees to be Hartshorne & Curley Insurance's successor in interest with regard to the maintenance and protection of the information collected; and (3) agrees to the obligations of this privacy statement.