



Privacy Policy

Last Updated: November 1, 2024

This Privacy Policy (hereinafter, the “Policy”) describes how Companion Protect, LLC located at 11460 Tomahawk Creek Parkway – Suite 300, Leawood, KS 66211, as well as our affiliates and subsidiaries (collectively "Companion Protect" or "we" or "us" or "our") use the Personal Information that we collect, receive, maintain, and store about you. “Personal Information” is information that identifies, relates to, describes, or is reasonably capable of being associated with or linked to an individual. Companion Protect respects the privacy and confidentiality of the Personal Information that has been entrusted to us.

Our Privacy Policy, GLBA Privacy Notice, and CA Important Privacy Choices for Consumers may collectively be referred to as our “Privacy Notices.”

Sections

Applicability of this Policy

Personal Information: Collection, Use, and Sharing

Does Companion Protect Sell My Information?

Minor Children

Links to Third Parties and their Sites

Cookies and other Tracking Technologies

Respecting your Privacy Rights

- Request Error Correction
- Request Categories of Personal Information
- Request to Do Not Sell my Personal Information
- Request for Deletion
- Request Marketing Opt-Out
- Request GLBA Opt-Out
- Request Access to my Personal Information
- Request to limit use and disclosure of Sensitive Personal Information

International Access to Products and Services

Non-Discrimination

Security of your Personal Information

Contacting Companion Protect for Privacy Related Requests

Updates to this Policy

State Specific Addendum

Cookie Policy

Applicability of this Policy

This Policy applies to our websites, applications, and electronic communications on which it appears or is linked from, and methods in which you may use to electronically communicate with us such as e-mail, phone, or chat or web forms (the “Platform”) unless otherwise clarified below. Please read this Policy carefully, by interacting with us through the Platform you consent to this Policy.

Based on the nature of our business with us, there are scenarios in which this Policy may not apply to your Personal Information:

- Personal Information we collect, process, and share in our role as a Service Provider to a business (“Client”) where we are not the data controller. In such cases, please review the privacy policy on the website of the applicable insurance and/or wellness provider (usually found at the bottom of their website home page) for information about their privacy practices and how to contact them with your question; or, to submit a privacy rights request. When we are a Service Provider, we are contractually required to comply with the confidentiality and data processing obligations set forth by the given Client in compliance with applicable law related to your personal information and will assist them (as needed) with privacy rights requests in scope of the services we provide.
- Where we are not functioning as a Service Provider to a Client, Personal Information we collect, process, and share that is subject to the Gramm-Leach-Bliley Act (“GLBA”) and shall be subject to our GLBA Privacy Notice. California residents should also review the Important Privacy Choices for Consumers in addition the GLBA Privacy Notice.

- This includes Ringo Pet Insurance and regulated pet wellness products
- This does not include Ringo Pet Wellness

To see our most current GLBA Privacy Notice or California Important Privacy Choices for Consumers document, please visit: <https://poweredbycompanionprotect.com/privacy-policy>.

Personal Information: Collection, Use, and Sharing

We may collect Personal Information about you in a variety of ways. Here are some examples (although this should not be considered an all-inclusive list).

Collection

We may collect information about you through the following means:

Directly From you

For example, when you access, register, or use an account on the Platform, inquire about our products and services, make a purchase, submit an employment application, or pursue an independent contracting opportunity, or otherwise correspond with us (including but not limited to our customer service team) through the Platform, mail/courier, phone, chat, or email.

From our Service Providers

Our Service Providers may collect and process Personal Information on our behalf in accordance with our agreement with them. For example (but not limited to):

- a cloud or SaaS application provider who allows us to collect, store, host, and/or process our data using their hosted application or cloud platform to provide and support the services and products we provide you.
- a PCI-DSS or NACHA compliant payment processor that processes payments via their secured systems on our behalf, or that may be used to pay a claim or process a wellness claim or reimbursement.
- a provider of analytics and reporting, system monitoring and maintenance, or that supports the security of our Platform and systems; or a provider that prints and mails documents related to the products and services you may purchase from us.

Indirectly from you

- We may provide you access to value added services through our trusted business partners; and, if you use these services (by accepting their terms of use and/or privacy policy) they may inform us that you used the service or provide limited information about your use of the service. For instance, a pet information service or pet health advisory service that can assist you in determining whether you should take your pet to be seen by a veterinarian, may verify with us that you have permission to access that service or that you used the service.
- Through your veterinarian to verify or answer questions we may have about claims and wellness reimbursements you request us to process.
- Via an animal shelter where you recently adopted a pet, and you authorized them to share contact information so we could market our pet products and services that you may be interested in.
- A third-party shelter software provider may identify you as an adopter of a pet from a shelter or provide you an opportunity to purchase certain pet wellness products during the adoption checkout process.
- Through a joint marketing agreement we may have with another financial company regarding pet insurance and/or pet wellness products as permitted under the GLBA.

Use of Personal Information

We may use Personal Information (including some that may be classified as Sensitive Personal Information) within the categories described below, to fulfill the reasons you provided it to us in the first place and meet any subsequent obligations. We may also use your Personal Information:

- to conduct internal business purposes and to further protect or secure our systems and data.
- to assist you in learning more about our products and services; and complete a purchase.
- to support, maintain, and otherwise service the products and services you obtain from us; respond to your inquiries (including to respond and investigate your concerns); and monitor and improve our responses to current and prospective customers.
- to market our products and services to you; or to make you aware of products and services our business partner(s) may offer and that you might be interested in.
- to provide you with the ability to opt-in to a value-added service or product offered by a business partner or third-party (*please note: your use of such services is subject to the terms of use and privacy policies of the third-party*).
- to respond to law enforcement requests and comply with applicable laws, court orders, or government regulations.
- to prevent or respond to the possibility of fraud.
- to apply for employment opportunities within Companion Protect.
- or, as otherwise described to you when collecting your Personal Information, requested by you, or as set forth elsewhere in our Privacy Notices.

Categories of Personal Information that Companion Protect May Collect and Use

If you have engaged with Companion Protect outside of a Service Provider relationship we may have with our clients, we may have collected the following categories of Personal Information during the past 12 months and/or may continue to do so. Use of Sensitive Personal Information is restricted to that which is necessary to perform services you request, provide products you requested or purchased, or as necessary to seek employment with us.

Category	Examples	Collected	Use
Identifiers	<p>Name, Email Address, Phone Number, Mailing/Billing Address, electronic signature, bank account or credit/debit card number, IP address</p> <p><i>Companion Protect asks that you never submit credit, debit, or bank account information via email, within a voicemail, or via a text message/chat session.</i></p>	YES	<p>To identify and communicate with you as requested; to market, provide and service the products you are or may be interested in or have purchased through us, and to allow us to receive payment for the products or services you purchased, or to evaluate your interest in employment with us.</p> <p>Note: Public IP addressing is included in email headers and network packets and collected through security/system logs are used to allow you to communicate with our Platform via the Internet, for system and application monitoring, security, fraud prevention, and troubleshooting purposes.</p> <p>Public IP addresses are not used to directly identify you and does not provide us with your precise geolocation. Your public IP may change frequently and vary from where you connect to the internet, the internet provider you are actively connected through at any given time via your device, and whether you leverage a Virtual Private Network (VPN) or other IP masking functionality.</p>
Characteristics protected under law.	Age, ethnicity, citizenship, marital status, physical illness, mental illness or disabilities, gender, veteran status, etc.	<p>Customers</p> <p>YES</p> <p>OPTIONAL and LIMITED</p>	<p>We may offer product discounts to current or former military out of our respect for your current or past service to our country. Your optional acknowledgement of your military service will not be used for any other purpose other than to provide you with a discount (if such a discount is currently available).</p>
		<p>Employment</p> <p>YES</p>	<p>Proof of citizenship and eligibility to work in the US is requested for employment with Companion Protect.</p> <p>Other information such as gender, veteran status, ethnicity, and disability, may optionally be provided by employees for reporting purposes, or for benefits enrollment or other HR/payroll purposes and will not be used to discriminate against you regarding employment with us, and is subject to our internal confidentiality policies and/or Employer Group Health Plan Privacy Notice versus this Policy.</p>
Commercial Information	Information about the products and services you may be interested in and purchase from us.	YES	Provide you with, maintain, and support the products and services that you are interested in and may purchase from us.
Biometric Data	Fingerprints, Voiceprint Identification	NO	

Internet or other Electronic Network Activity	Online Chat sessions, Emails, Voice, applications, network/internet/SaaS communication and logs that are transmitted by your device and/or browser to us while accessing our Platform and related cloud and SaaS infrastructure	YES	To provide you a platform from which to receive a quote, obtain our products and services. We may also use it to monitor our application systems, performance, errors, system availability, security, fraud detection/prevention, and allow us to communicate with you.
Geolocation (approximate)	Public IP address associated with use of the Platform or establishment of connection of your browser to Companion Protect's Platform may provide an approximation of your location.	YES	For system logging to assist in providing troubleshooting, fraud detection/prevention, system and account security, and incident response for Platform and user accounts, and internal aggregate analytics of Platform or system usage. Approximate geolocation is associated with geolocation of the entity that owns the public IP address that you are connecting to the internet.
Audio, Electronic, Visual Information	Recording of Phone Calls, Voicemail, Photographs, Video	YES	<p>Quality assurance, authorization of requests, customer service voicemail.</p> <p>We do not actively ask for customer photographs besides your pet(s) through the Platform. However, if you upload a picture of your pet(s) to the Platform, or provide a photo to us, you are solely responsible for obtaining permission from all persons(s) including yourself, that may happen to also be in the photo with the pet(s).</p> <p>We may take and use photographs or video of employees, contractors, and visitors to our office for legitimate business purposes including but not limited to the physical security of our business and offices.</p>
Professional or Employment-Related Information	Applications for employment with Companion Protect or resumes.	<p>Customers NO</p> <p>Employment YES</p>	<p>From those seeking employment with Companion Protect</p> <p>Employment information once hired subject to internal business policies and procedures to maintain the confidentiality of your information.</p>
Non-Public Education Information under FERPA**	<p>Education Level, School or University Attended</p> <p>** Companion Protect is not a FERPA covered entity.</p>	NO	<i>Note: we may request education verification as part of a pre-employment background check with your prior authorization.</i>
Inferences drawn from other personal information to create an individually identifiable profile on our consumers.	Use public records information combined with personal information we may have about you to create inferences about you and create a consumer profile about you as an individual.	NO	

Categories of Sensitive Personal Information			
Government Identification	Driver's License, State ID Card, Passport, SSN	Customers NO	
		Employment YES	Those seeking employment opportunities may be required to provide form(s) of government ID and SSN such as may be required for: I-9, W-4, W-9, payroll, benefits, or a required pre-employment background check. <i>Note: Pre-Employment Background checks are subject to applicable law require your authorization to be completed.</i>
Financial Account Login	Account log-in information (e.g., financial account or credit card numbers in combination with any required access codes or passwords) <i>Note: We do not provide banking or credit card accounts to customers or request/store/process your login credentials for your banking or credit card accounts.</i>	YES* (Limited)	* Only to the extent that we provide a customer portal account from where you can see the products and services you have purchased, submit claims for pet insurance products or reimbursement/claims requests for pet wellness products, review the products or services purchased, or request additions or changes to them or update your payment information via our payment processing provider. You are solely responsible for creating a strong password that has not been used elsewhere, is not easily guessed, and for not sharing your login credentials. You may change your password at any time via our customer portal. We are unable to provide or decrypt your password if you lose it. If you forget your password to the Customer Portal, you may request a single use time sensitive password change link be sent to the email address you have on file with us.
Precise Geolocation	Maintain a precise and accurate location to where you located when you are communicating with our Platform or Companion Protect (consistently accurate to 1850 feet or less).	NO	
Consumer Racial or Ethnic Origin, Religious Beliefs, Union Membership	Consumer Racial or Ethnic Origin, Religious Beliefs, Union Membership	Customers NO	
		Employment OPTIONAL	Race and/or ethnicity may be optionally provided to the employer during benefits enrollment following the acceptance of an employment offer.
Genetic Data of a Person	Collecting information about our customers' DNA or health history	NO	
Biometric data for purposes of identifying consumer	Using your fingerprint or voiceprint to identify you as a current or former consumer.	NO	

We do not collect additional categories of Personal Information (including Sensitive Personal Information) or use it for materially different, unrelated, or incompatible purposes without providing you notice.

How Long Do We Retain Your Personal Information?

Companion Protect may retain your Personal Information in accordance with its retention policy and as permitted or required by applicable laws or regulations. Should a legal obligation require us to extend the retention period for a set of data, the Personal Information considered end of life will be destroyed following the expiration or lifting of such legal obligation. Retention periods are subject to change. Certain Service Providers such as payment processors, may have separate retention requirements that we cannot modify (for instance, maintaining accounting of proof of financial transactions in which they process on our behalf).

Disclosure of Your Personal Information

We may share your Personal Information as described below or elsewhere within this Policy as permitted by law, unless opted out by you where permitted by law or our Privacy Notices:

- Within Companion Protect – to authorized team members within our family of companies for business operations.
- Service Providers – When we hire a service provider to help operate the Platform or our business (including the collection and processing of payments) we may give access to Personal Information as necessary to perform or provide the service for Companion Protect. This may include, but is not limited to, Service Providers that operate our Platform, send our communications, or run promotions. Such Service Providers do not use the Personal Information for their own purposes; but may provide the infrastructure or services (such as but not limited to Salesforce) so that we can appropriately provide and support the services and products that you have requested from us.
- As otherwise approved or directed by you. We may share your Personal Information in a manner that has otherwise been directed, requested, or approved by you.
- Third Parties for Marketing Purposes – We do not currently share your Personal Information with third parties for their own marketing purposes without your permission (we may share with our Service Providers so that we may run our own promotions).
- Joint Marketing Agreements with other Financial Companies – Where applicable and as defined and in accordance with our GLBA Privacy Notice.
- Legal obligation or protection from harm - When we have a good faith belief that access, use, preservation or disclosure of the Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of the Terms of Use, (c) detect, prevent, or otherwise respond to fraud, error, security, or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Companion Protect and its users and customers, or the public against harm.
- Partner Shelters or Veterinary Practices – We may share information about you with a partner shelter from which you adopted a pet from or your veterinary practice to assist us in providing the products or services you may purchase or inquire about, or to confirm eligibility for you to use a value-added service. We may share data with your veterinary provider to assist us in your request to process a claim or wellness claim/reimbursement.
- Employment – For business purposes that may be associated with your employment (employment application) with Companion Protect.
- Other Purposes as Described. We may share your Personal Information for other purposes, as we describe to you.

Categories of Information that we may Share about You

We may share the following categories of information outside of Companion Protect without further permission.

Category	Disclosed	How Disclosed or Further Clarifications
Identifiers	YES	Service Providers, Partner Shelters, or with your Veterinary Practice(s) for the reason(s) described under <i>Disclosure of Your Personal Information</i> above.
Characteristics protected under law	YES	Service Providers
Commercial Information	YES	Service Providers
Biometric Data	NO	Not Applicable
Internet or other Electronic Network Activity	YES	Service Providers (as it relates to your access of our or our service providers' systems).
Geolocation (approximate)	YES	Service Providers
Audio, Electronic, Visual Information	YES	Service Providers
Professional or Employment-Related Information	YES	Service Providers (only for job application and employment purposes)
Non-Public Education Information under FERPA	NO	NOTE: We are not a FERPA Covered Entity, we may request education verification as part of a pre-employment background check with your authorization.

Inferences drawn from other personal information to create an individual profile on our consumers.	NO	Not Applicable
Sensitive Personal Information		
Government Identification	Customers NO	Not Applicable
	Employment YES	HR Service Providers or Government as required
Financial Account Login	Customers YES (Limited)	Your Customer Portal account is hosted via a Service Provider (Salesforce). Your password to your Customer Portal account cannot be retrieved by us.
	Employment NO	Not Applicable
Precise Geolocation (as previously defined)	NO	Not Applicable
Consumer Racial or Ethnic Origin, Religious Beliefs, Union Membership	Customers NO	Not Applicable
	Employment YES (Optional)	If you optionally provide racial or ethnic origin while enrolling for benefits offered to employees, it may be shared with an HR Service Provider supporting benefits.
Genetic Data of a Person	NO	Not Applicable
Biometric data for purposes of identifying Consumers or Customers	NO	Not Applicable

Minor Children

This Platform and the products and services we provide are meant for those that can enter a contract and are 18 years of age and older within the United States and its territories. The Platform was not designed to attract the attention from persons under the age of 13 or sell our products and services persons under the age of 18. As a parent or legal guardian, should you feel that our Platform may have Personal Information about your minor child, you may request its removal by sending a request to us as indicated in the section *Contacting Companion Protect for Privacy Related Requests*. Please identify your request as **COPPA Request**.

Links to Third Parties and their Sites

Our Platform may include third-party content and links to third-party websites and services that collect Personal Information (including but not limited to value added services). These links may also include embedded links to third-party YouTube videos, Giphy images, etc. In such cases, you are responsible for reviewing the privacy policies and terms of use of such sites and services prior to using them and use such sites at your own risk.

Cookies and Other Tracking Technologies

By continuing to use this Platform, you agree to our Cookies Policy (that can be found as an addendum at the end of this document) and review it often for changes.

Respecting Your Privacy Rights

We will further respect your privacy rights as described below. Unless otherwise noted below, all requests must be made in accordance with the section of this Policy entitled: *Contacting Companion Protect for Privacy Related Requests*. We will strive to respond on the status of your request within 10 business days following receipt (unless otherwise noted below)

1. *Can I request that an error in my Personal Information be fixed?*

YES – If it is determined to be incorrect, we will gladly make the correction for you. You may be able to update some information yourself via the Customer Portal or by contacting our Customer Service Team at service@companionprotect.com or 800-304-9930. For employee errors, please contact HR for assistance. You will need to be able to confirm your identity

to prevent potential fraud or misuse of your Personal Information. Should you still not be able to resolve such a request and still feel the information is in error, you may submit a request to the Privacy Officer for further assistance via a means identified in *Contacting Companion Protect for Privacy Related Requests*.

2. *Can I request what categories of Personal Information Companion Protect currently has about me?*

YES – You will need to be able to confirm your identity to prevent potential fraud or misuse of your Personal Information. We will complete such a request up to twice per year per requestor at no charge. We may take up to 45 days to respond to your request, and upon notice, may extend that time an additional 45 days for a total of 90 days following receipt of your request.

3. *Can I request that you not sell my Personal Information?*

YES – Please submit your request to us stating *Do Not Sell My Personal Information*.

Does Companion Protect sell my Personal Information? If, and when Companion Protect is involved in a merger, acquisition, or any form of transfer or sale of some or all its business, Personal Information (including Sensitive Personal Information) may be transferred along with the business. Where legally required, we will provide prior notice and if you have a legal right to do so, an opportunity to object to such transfer. If you have previously opted out of any sharing or selling of your information, the acquiring entity will be notified of your prior privacy rights request as a condition of such an acquisition. Companion Protect does not sell your Personal Information to third parties for their marketing purposes or to third party advertising networks. You may still choose to opt out from the sale of your Personal Information by submitting a request to us.

4. *Can I request that you delete the data you have about me?*

YES – you may make such a request, we may delete (which such a process may include erasure, redaction, or anonymization of the applicable identifiers); however, your request may be temporarily, partially, and/or fully denied based on the nature of the request and the information we may have about you. Some Personal Information is exempt from deletion requests. If you request to delete the data, we have about you—we will also mark your account as opted out from sale of your Personal Information. We may take up to 45 days to respond to your request, and upon notice, may extend that time an additional 45 days for a total of 90 days following receipt of your request. If we deny any part of your request, we will provide an explanation for the denial. You will need to be able to confirm your identity to prevent potential fraud or misuse of your Personal Information

5. *Can I opt out of receiving marketing communications about your products and services?*

YES - You may email us your request to opt-out of our marketing. If emailing, us, please place **marketing opt out** in the subject line. We may continue to use such data for internal business analytic purposes. You may also choose to include in your marketing opt-out request, that we delete you from our marketing database(s). Requesting marketing information after an opt-out will be considered re-opting into marketing communications from us. We may continue to send you non-marketing communications regarding products or services you have already purchased from us.

6. *Can I exercise opt-out requests as permitted under GLBA or our California Important Privacy Choices for Consumers?*

YES - But all GLBA Opt-Outs must be requested via instructions within the GLBA Opt-Out procedure outlined in our GLBA Privacy Notice that is referenced above under *Applicability of Privacy Policy and Notice*. If you are a California resident you may also choose to exercise opt-out rights found in the Important Privacy Choices for Consumers.

7. *Can I request access to the Personal Information you have about me (and how it is used and shared)?*

YES – Most of the information can be found within your Customer Portal and use and sharing is described within our Privacy Notices. If you desire further details, are no longer a customer, or never were a customer you may make such a request of us. We may take up to 45 days to respond to your request, and upon notice, may extend that time an additional 45 days for a total of 90 days following receipt of your request. If we deny any part of your request, we will provide an explanation for the denial. You will need to be able to confirm your identity to prevent potential fraud or misuse of your Personal Information. You will need to be able to confirm your identity to prevent potential fraud or misuse of your Personal Information and agree to a secure means by which it will be sent to you.

8. Can I request the limiting the use and disclosure of Sensitive Personal Information collected about me?

CUSTOMERS: No/Not Applicable – We do not collect Sensitive Personal Information other than using Personal Information you have already provided to create and grant you access to your customer portal account as part of providing the products and services you have requested and purchased. You create your own password for your customer portal login that cannot be decrypted by us or our Service Provider that provides our customer portal application infrastructure. This is not subject to limitation.

EMPLOYMENT RELATED: YES – Please note: the collection and use of any Sensitive Personal Information as part of employment processes is done so only for legitimate business and employment purposes such as to administer the employment relationship and in accordance with applicable law; and as such, may not be subject to further limitation. Sensitive Personal Information is not typically collected until after an offer of employment is accepted by you and is handled confidentially by only authorized Companion Protect team members and HR Service Providers or as described elsewhere in this Policy. In order to determine if any of your Sensitive Personal Information is able to be further limited in use/disclosure (such as for data that was optionally provided by you), please contact Human Resources for assistance; or you may also choose to contact our Privacy Officer at privacy@companionprotect.com or via another means identified in this Policy.

Non-Discrimination

Companion Protect will not discriminate against you for contacting us, making a privacy rights request, or complaint. If you have a concern about potential discrimination related to any request, please contact our Privacy Officer via a method described under *Contacting Companion Protect for Privacy Related Requests*.

International Access to Products and Services

We do not actively market to, nor do we currently sell our products and services to individuals located outside of the United States and its territories. We also do not currently support international customers of our Clients in a Service Provider capacity. As such, international privacy laws such as the EU General Data Protection Regulation (“GDPR”) are not applicable to Companion Protect nor the products or services that we currently provide.

Security of Your Personal Information

Companion Protect implements reasonable security measures and practices to protect your information from unauthorized access, use, disclosure, or modification. As a part of these practices, Companion Protect and its Service Providers leverage encryption (i.e., via TLS, historically referred to as “SSL”) to protect the transmission of your Personal Information over the public Internet. **Even though reasonable security measures are implemented to protect our Platform and its infrastructure, you understand and accept by further using our Platform, that no combination of security controls by us or our Service Providers, can create an environment that is perfectly or completely secure. Further, by using this Platform, you are solely responsible for maintaining the confidentiality of your customer portal credentials in addition to maintaining proper security of the devices and their associated browser(s), application(s), and operating systems that you may connect to our Platform and communicate with us from.**

Contacting Companion Protect for Privacy Related Requests

If you have any questions about this Policy, or our Privacy Practices, or wish to make a request or complaint in conjunction with our Privacy Notices, please contact us via one of the three methods listed below. We will strive to provide an update on the status of your request within 10 business days following receipt by Companion Protect’s privacy team.

Email:	privacy@companionprotect.com
US Mail/Courier:	Attention: Privacy Officer Companion Protect, LLC 11460 Tomahawk Creek Parkway, Ste. 300 Leawood, KS 66211
Phone (Toll-Free):	(855) 864-4406 (this toll-free number only supports privacy requests)

Updates to this Policy

This Policy was last updated on November 1, 2024. Please note that this Policy and any subsequent policies it references, may be updated from time to time. As such, it is important that you review them often. Unless otherwise indicated, any changes to this Policy will apply immediately upon posting to the Platform so please visit our site periodically for updates. Your continued use of our Platform following an update to this Policy indicates your acceptance of those changes. We will provide notice of material changes to

this Policy by placing the updated Policy here on this site, or by communicating with you in the manner and format in which we typically communicate with you in our regular course of business, or as otherwise required by law.

Prior Version: January 20, 2024

Original Version: March 1, 2017

State Specific Addendum

Please review any state specific items within our GLBA Privacy Notice. Regarding our privacy practices where we are not in a Service Provider relationship with a Client:

California

California residents should also review the *Important Privacy Choices for Consumers* document as it relates to our Pet Insurance and regulated pet wellness products (excluding Ringo Pet Wellness). Companion Protect did not meet the minimum thresholds for the California Consumer Privacy Act “CCPA” (as amended) on as of November 1, 2024, and does not expect to meet the minimum thresholds by December 31, 2024.

Texas

Companion Protect is considered a small business as defined by the US Small Business Administration and does not engage in the selling of sensitive data; and does not meet the threshold for the Texas Data Privacy and Security Act as of November 1, 2024; and does not expect a change to this status by December 31, 2024.

Other States:

Companion Protect did not meet the minimum thresholds that require compliance for the following state data privacy laws as of November 1, 2024; and does not expect to meet those minimum thresholds by December 31, 2024.

- Colorado Privacy Act
- Connecticut Data Privacy Act
- Virginia Consumer Data Protection Act
- Montana Consumer Data Privacy Act
- Oregon Consumer Data Privacy Act
- Utah Consumer Privacy Act
- Florida Digital Bill of Rights

As of November 1, 2024, Companion Protect **does not** expect to meet the state-specific minimum thresholds that would require compliance when the following state-specific laws when they go into effect.

January 1, 2025:

- Iowa Consumer Data Protection Act
- New Hampshire Data Privacy Act
- Delaware Personal Data Privacy Act

January 15, 2025

- New Jersey Data Privacy Act

July 1, 2025

- Tennessee Information Protection Act

Cookies Policy

Updated: November 1, 2024

Introduction

We may collect information about users and their use of or interactions with the Platform and our communications by using tracking technologies including tracking pixels (also known as web beacons or pixel tags), link tracking, or cookies for different purposes.

Applicability

The Cookies Policy is considered an addendum to the Companion Protect Privacy Policy and applies to our Platform where we are not functioning as a Service Provider.

Acknowledgement

Your continued use of our Platform serves as acceptance of Companion Protect's then current Cookies Policy and Privacy Policy. If you do not agree with our Cookies Policy or the Companion Protect Privacy Policy, please immediately cease using the Platform and clear your web browser's cache (see <https://www.aboutcookies.org/how-to-manage-and-delete-cookies>).

Tracking Pixels and Link Tracking

We may use tracking pixels (which may also be a small invisible image): (i) for email tracking and marketing and advertising campaigns; (ii) to confirm that you did not complete the purchase of a product or service with us; (iii) to remarket or communicate to you if you did not complete a required or recommended action associated with a purchase or the maintenance of your product or service.

For instance, when you open the email, if your email client is set or instructed by you to load images, it may download an image from our tracking platform server from which we may be able to confirm that you opened an email we sent you directly or via our service providers' platform. We may also be able to track that you clicked on a link in such an email via a tracking code that is embedded in the link (i.e., link tracking), or if you abandon the purchase of a product or service to send you a follow-up communication to prompt you to complete the purchase. We may use service providers to assist us in this process, but your Personal Information is not being sold or shared to such service providers for their own use. Should you no longer wish to receive marketing or advertising emails and communications from us as it relates to Companion Protect's products and services you can click on the unsubscribe link in the footer of the email; or submit a marketing opt-out via one of the contact options in our Privacy Policy.

Cookies

We (or our service providers) may use cookies when you interact with our Platform through your device's browser. Cookies are small files that download to your device when you access certain websites. For more information about cookies please visit: <https://www.allaboutcookies.org>. We or our service providers may use cookies that are session-based or persistent. Session cookies expire when you close your browser or turn off your device. Persistent cookies remain on your device after you close your browser or turn off your device.

We may place first or third-party cookies when you access features of our Platform through your web browser. We may place first party (our cookies) for: analytics, sessions, and security, functionality, and performance purposes; or third-party cookies mostly via our service providers.

Our service providers may place their first party cookies as part of the system we have licensed that makes up part of our Platform. For instance, our customer service chat provider needs to place cookies through your browser session for the text chat box and chat session to work properly, other service providers such as Salesforce may place cookies related to functionality choices, analytics for us and assisting in maintaining security and monitoring performance of their system(s).

Should we display links to third party (including media) sites such as but not limited to YouTube or Vimeo on our Platform, you are understanding you are leaving our Platform and these third-party media providers and sites may place their cookies subject to their privacy practices on your browser if you view or access these pages which may be used for their advertising, analytics or for necessary/functionality-related purposes.

Type of Cookies	Description
Necessary	Necessary cookies are required/essential for the Platform to function properly and for you to navigate our sites and use their features.

Performance (includes Analytics)	Performance cookies collect analytics information about how users interface with the Platform, including which pages users go to most often, and if they receive error messages from certain pages. These cookies do not collect information that individually identifies you. They may be used to improve how the Platform functions, performs, and is utilized. They may also serve a security purpose and be considered a necessary cookie.
Functional	Functionality cookies allow the Platform to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. They also help perform certain functionalities like sharing the content of the website on social media platforms, collecting feedback, and other service provider or third-party features.
Advertising	Some cookies may be used for advertising purposes. For instance, if you interact with third party media providers such as, but not limited to YouTube, by watching such videos/media that may be embedded on companionprotect.com, advertising cookies may be set on your device. Note: Now, and for at least 24 months prior to the current release date of this Cookie Policy, we have not used cookies to conduct targeted advertising campaigns or cross context behavioral advertising for Companion Protect's products and services in which we are the data controller. Currently we may track the effectiveness of our marketing communications through numerical campaign identifiers via link tracking, tracking pixels, Google Analytics/Google Tag Manager, and Salesforce Marketing Cloud.

Analytics

We may use cookies to support analytics services such as (but not limited to) Google Analytics and Hotjar to collect aggregate information about how you interface with our Platform. Microsoft Application Insights is also required to provide application/system performance/troubleshooting analytics logs as it relates to our Azure environment.

For more information on Google Analytics' processing of your information, please see *"How Google uses data from sites or apps that use our services"* at <https://www.google.com/policies/privacy/partners>.

Some cookies and other technologies help sites and apps understand how their visitors engage with their services. For example, Google Analytics uses a set of cookies to collect information and report site usage statistics without personally identifying individual visitors to Google. '_ga', the main cookie used by Google Analytics, enables a service to distinguish one visitor from another and is configured to last for at least 7 days on our Platform. Any site that implements Google Analytics, including Google services, uses the '_ga' cookie. Each '_ga' cookie is unique to the specific property, so it cannot be used to track a given user or browser across unrelated websites.

Do Not Track Signals and Managing Cookies

Some browsers have a "do not track" feature that prevents a website from tracking you, as well as additional cookie settings. *Our Platform does not respond to the Do Not Track signal and our service providers do not necessarily respond to this signal unless otherwise described herein.*

You can control cookies and tracking tools. Newer browsers may have features (including default features) that block third party cookies by default and other trackers. These browsers may not block first party cookies implemented by our service providers who provide functionality for the platform.

If you choose to block all cookies or all third-party cookies and other trackers, certain features of the Platform may not work properly or may not be available to you. Blocking or rejecting cookies may not stop all the tracking described in this policy. These features and options are browser and device specific and are not uniform. You can usually find these settings in the options or preferences menu of your browser. To understand these settings, the following links may be helpful, or you can use the help option in your browser for more details.

How do I Manage and Delete Cookies?

To find out more on how to manage and delete cookies for common browsers, visit <https://www.aboutcookies.org/how-to-manage-and-delete-cookies>.

Opting out of Google Analytics and HotJar Analytics and Restricting Tracking for your Browser

Google Analytics Opt-Out

If you want to opt-out, download and install the add-on for your web browser. The Google Analytics opt-out add on is designed to be compatible with Chrome, Safari, Firefox, and Microsoft Edge. To function, the opt-out add-on must be able to load and execute properly on your browser. Learn more about the opt-out and how to properly install the browser add-on at <https://tools.google.com/dlpage/gaoptout>.

Hotjar Do Not Track

Hotjar currently respects the do not track header. Please visit the following link (<https://www.hotjar.com/policies/do-not-track>) to enable this header for the browsers in which you do not wish Hotjar to collect analytics data. Companion Protect does not collect identifiable form data via our Hotjar analytics.

Further Restricting Third-Party Cookies

Please review the following for additional ways to restrict third-party cookies and tracking in various browsers. Older and unsupported versions of these browsers may not have all these features.

- **Safari** – Safari’s current browser has tracking and third-party cookie blocking features. <https://support.apple.com/en-gb/guide/safari/sfri40732/mac>
- **Chrome** - Note that Incognito Mode in Chrome allows you to browse the web without recording webpages and files in your browser or Account history (unless you choose to sign in). Cookies are deleted after you've closed all your incognito windows and tabs, and your bookmarks and settings are stored until you delete them. <https://support.google.com/chrome/answer/95647>
- **Firefox** – Firefox has third party cookie and tracking features in its current browser version <https://support.mozilla.org/en-US/kb/how-do-i-turn-do-not-track-feature>
- **Microsoft Edge** – The current version of Microsoft Edge gives you control over tracking prevention. <https://support.microsoft.com/en-us/microsoft-edge/learn-about-tracking-prevention-in-microsoft-edge-5ac125e8-9b90-8d59-fa2c-7f2e9a44d869>
- **Brave** – Built on chrome but with additional privacy related features and tracking prevention. <https://brave.com/shields/>
- **Internet Explorer** – *This browser is end of life and is not supported nor recommended by Companion Protect.*
- **Duck Duck Go** - Unlike Chrome and other browsers, this browser comes with over a dozen powerful privacy protections built-in, including their own search engine that replaces Google and doesn’t track your search history. <https://duckduckgo.com/duckduckgo-help-pages/privacy/web-tracking-protections/>

On a mobile device such as a phone or tablet, you may also be to adjust your settings to limit ad tracking. Please check your iOS or Android settings for your specific mobile device.

Opting out of Interest-Based Advertising

For more information on choices regarding use of your specific device’s web browser activity for interest-based advertising you may visit the following sites for how to opt out of advertising platforms that agree to the Digital Advertising Alliance’s principles.

- <https://thenai.org/opt-out/>
- <https://optout.aboutads.info>
- <https://youradchoices.com>

Prior Version: January 20, 2024