

Privacy Notice for CA Policy Holders

This section applies only to California residents and provides additional details about the Personal Information we collect about California consumers through the website and the rights afforded to them under the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (CPRA), and all effective regulations implemented thereunder (referred to collectively in this Policy as the “CCPA”). The terms used in this section have the meanings given to them in the CCPA. For California residents, the provisions in this section add to, and do not replace, the provisions in the rest of this Policy.

1. Your Privacy Rights

If you are a California resident, you have certain rights in relation to your Personal Information; however, your rights are subject to certain exceptions. Below are the specific rights provided to you by the CCPA:

- **Right to know.** You have the right to request, in writing, that we disclose to you (a) the categories of Personal Information we have collected about you, (b) the categories of sources from which your Personal Information is collected, (c) the business or commercial purposes for the collection, sale, or sharing of your Personal Information, (d) the categories of third parties with which we disclose your Personal Information, and (e) the specific pieces of Personal Information we have collected about you. Note that no request is necessary for items (a) through (d), as these are disclosed to you in Sections 3 and 4, below.
- **Right to delete.** You have the right to request that we delete any Personal Information we have collected from you or maintain about you, subject to certain exceptions.
- **Right to correct.** You can ask us to correct inaccurate Personal Information we have about you.
- **Right to know what Personal Information is “sold” or “shared” and to whom.** To the extent that we “sell” or “share” Personal Information, or disclose it for a business purpose, you may ask us to disclose to you (a) the categories of personal information that we have collected about you; (b) the categories of personal information that we have sold or shared about you and the categories of third parties to whom your personal information was sold or shared, by category or categories of personal information for each category of third parties to whom the personal information was sold or shared; or (c) the categories of personal information that we disclosed about you for a business purpose and the categories of entities to whom it was disclosed for a business purpose. This information is disclosed to you in Section 3, below. We do not sell your personal information.
- **Right to opt out of the “sale” or “sharing” of Personal Information.** We do not sell your personal information. The CCPA defines “sharing” in a particular way that includes allowing third parties to receive certain information such as cookie identifiers, IP addresses, or browsing behavior to add to a profile about your device, browser, or you. Such profiles may enable delivery of interest-based advertising by such third parties within their platform or on other sites. Unless you opt out, we may share the following categories of information for such interest-based advertising, which may be considered “sharing” as defined by the CCPA: (1) device information and identifiers, such as IP address and cookies; and (2) connection and usage information, such as browsing history. You may opt-out of such sharing by doing any of the following: (a) using a Global Privacy Control (GPC) opt-out signal on your browser that signals to us that you have opted out of the sharing of your personal information, or (b) clicking “Do Not Sell or Share My Personal Information” in our cookie banner (note that this functions as an opt-out method because online cookies and similar tracking technologies are the only means by which we “share” personal information). For more information on clearing previously-placed advertising cookies, see the following browser-specific guides for Chrome, Firefox, Safari, and Edge.

- **Right to limit the use and disclosure of Sensitive Personal Information.** We collect, use, and disclose Sensitive Personal Information only within employment contexts for certain limited purposes that are permitted under the CCPA, such as to perform services reasonably expected; to prevent, detect, and investigate security incidents; to resist malicious, deceptive, fraudulent, or illegal actions; to ensure the physical safety of natural persons; and to verify or maintain the quality or safety of our services and devices. Because we use Sensitive Personal Information only for these limited purposes, we do not offer a right to further limit our use and disclosure of Sensitive Personal Information. Furthermore, we do not “sell” or “share” Sensitive Personal Information, as those terms are defined by the CCPA.
- **Right to non-discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising any of the rights described in this section.
- **Right to notice at collection.** At or before the time of collection, California residents may have a right to receive notice of our practices, including the categories of personal information to be collected, the purposes for which such information is collected or used, whether such information is sold or shared, and how long such information is retained.

2 Exercising Your Rights

In addition to the methods described above, you, or your authorized agent on your behalf, may exercise your rights described in this section by writing to us at MGT Insurance Company 5445 DTC Parkway Suite 720 Greenwood Village, CO 80111, Attn: Compliance. We may request additional information from you or your authorized agent, which we will use only to verify your identity, and for security or fraud-prevention purposes.

3. Categories of Personal Information We Collect.

Category of Personal Information collected	Disclosed for business or commercial purpose(s)	Categories of third parties to whom we disclose the information for a business or commercial purpose(s)	“Sold” or “Shared”
Personal identifiers, including real name, alias, Internet Protocol (IP) address, unique personal identifiers, postal address, email address	Yes	Our service providers Your authorized service providers Other third parties that you authorize Our business and marketing partners Third parties as required by law	We have not sold this category of Personal Information for monetary consideration. However, we may have shared this Personal Information with third-party cookie and tracker providers for cross-context behavioral advertising. See Section 1 and Section 5 for more information on cookies.
Financial information, including bank account number	Yes	Your authorized service providers Other third parties that you authorize	No

		Third parties as required by law	
Protected classification characteristics under California or federal law, such as age, gender, and veteran status	Yes	Your authorized service providers Other third parties that you authorize Third parties as required by law	No
Commercial information, including products/services purchased	Yes	Your authorized service providers Other third parties that you authorize Third parties as required by law	No
Internet or other electronic network activity information	Yes	Our service providers Your authorized service providers Other third parties that you authorize Our business and marketing partners Third parties as required by law	We have not sold this category of Personal Information for monetary consideration. However, we may have shared this Personal Information with third-party cookie and tracker providers for cross-context behavioral advertising. See Section 4.1 and Section 5 for more information on cookies.
Geolocation data (ISP level)	Yes	Our service providers Your authorized service providers Other third parties that you authorize Our business and marketing partners Third parties as required by law	No
Audio, electronic, visual, or similar information	Yes	Your authorized service providers	No

		Other third parties that you authorize Third parties as required by law	
Professional or employment-related information	Yes	Your authorized service providers Other third parties that you authorize Third parties as required by law	No
Inferences drawn to create a profile about a consumer	Yes	Your authorized service providers Other third parties that you authorize Third parties as required by law	No

4. How We Collect Your Personal Information

Below are the sources from which we may receive your Personal Information:

- Directly from you or your agents
- From your device, operating system, or browser
- From your internet service provider (ISP)
- From your organization
- From your vendors or customers
- From other third parties you choose to interact with, including social networks
- From our service providers
- From government entities
- From public sources

We may combine Personal Information that you provide us through our website with other information we have received from you or your agents, whether online or offline, or from other sources.

5. Purposes for Collecting and Using Your Personal Information

Below are the purposes for which we may collect and use the Personal Information listed in Section 3:

- Provide our services to you
- Communicate with you
- Our marketing activities
- Operate, improve, and perform analytics on our website
- Identify and repair errors in our website and services
- Prevent, detect, and investigate security incidents and other fraudulent or illegal activity
- Verify and maintain the quality or safety of our services
- Verify your identity
- Protect your account

- Recruit, hire, and onboard job applicants and conduct general human resources activities

6. How Long We Keep Your Personal Information

We retain your Personal Information as long as necessary to carry out the purposes set forth in this Policy and to comply with our data retention requirements. Even after you stop using our services, we may be required to keep your information for as long as necessary to comply with our legal and regulatory obligations, to make or defend legal claims, and to protect against fraudulent activity of others. We dispose of the information we collect in accordance with our retention policies and procedures.