

PRIVACY POLICY

Last Updated and Effective Date: November 17, 2025

This Privacy Policy describes how The Hilb Group LLC, its affiliates and subsidiaries (“we,” or “us”) collects, uses, discloses, and processes the Personal Information of our website users, customers and job applicants (“you” and “your”). We reserve the right to change this Privacy Policy at any time. If we change our Privacy Policy, we will post an updated version on this website. Please check back periodically to see if our Privacy Policy has been updated. Updates to the Privacy Policy will be referenced by the “Last Updated and Effective Date” date shown above.

We are committed to the highest level of integrity in all of our dealings. This commitment extends to any Personal Information that we might collect or process. We are committed to respecting personal privacy and safeguarding individual record confidentiality and system security.

1. Definitions.

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person or household.

“Personal Information” does not include: (a) publicly available information or lawfully obtained, truthful information that is a matter of public concern; or (b) information that is deidentified or aggregate information.

“Sensitive Personal Information” means Personal Information that reveals information such as: (a) social security, driver’s license, state identification card, or passport number; (b) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) precise geolocation; (d) racial or ethnic origin, religious or philosophical beliefs, or union membership; (e) the contents of an mail, email, and text messages unless we are the intended recipient of the communication; (f) genetic data; (g) information about a known child; (h) biometric information for the purpose of uniquely identifying an individual; (i) mental health, physical health and pregnancy; (j) sex life or sexual orientation, including status as a trans or binary individual; and (k) status a crime victim. Sensitive Personal Information that is publicly available is not considered Sensitive Personal Information or Personal Information.

Please note that various jurisdictions may use different terms. For example, some jurisdictions use the terms “personal data” or “sensitive personal data”. Moreover, some jurisdictions do not consider some of the Personal Information listed in the Sensitive Personal Information definition above as Sensitive Personal Information.

2. Information We Collect, the Categories of Source of Collection and the Purpose for Collection.

We may collect Personal Information about you from a variety of sources, including information we collect from you directly (e.g., when you contact us) and from other sources, described below. Note that we may be required by law to collect certain Personal Information about you, or as a consequence of any contractual relationship we may have with you.

Set forth below are the categories of Personal Information we collect and that have collected in the preceding 12 months, the categories of sources from which the Personal Information was collected and the business or commercial purpose for such collection. Please note that depending on your relationship with us we may not collect all of the information referenced below regarding you and we may not use your Personal Information for all purposes set forth in this Privacy Policy.

Category of Personal Information	What We Collect	Categories of Sources from which Personal Information Collected	Business or Commercial Purposes for Collection
PERSONAL INFORMATION			
Personal Identifiers	Real name Alias Postal address Telephone number Email address Unique personal identifier Online identifier Internet protocol address Account name Social security number Driver's license number Passport number National insurance number Credit history and scores Signature Characteristics or description Date of birth Insurance policy number and type and claim information Bank account number Credit card number Debit card number Other financial information (such as sort codes) Health insurance information	Directly from you Automatically, such as when you visit our website (e.g., cookies and tracking technologies)* Other parties (including other insurers, consumer-reporting agencies, our affiliated companies, or other third parties in the course of conducting our business)	To provide services to you To administer policies or process claims To provide, maintain, protect and personalize our services including our insurance products, consulting and broking services To deal with your inquiries and requests To perform system administration and to report aggregate statistical information to our advertisers To cooperate with regulators and law enforcement bodies To contact you with marketing and offers relating to products and services offered by us (unless you have opted out of marketing, or we are otherwise prevented by law from doing so) To personalize the marketing messages we send you to make them more relevant and interesting and to customize and enhance your website or app experience

			To resolve complaints, as well as handle requests for data access or correction To protect your, our or others' rights and interests To communicate with you regarding your account or changes to our policies, terms and conditions
Protected Characteristics	Race Color Religion (includes religious dress and grooming practices) Sex / gender Pregnancy, childbirth, breastfeeding and/or related medical conditions Gender identity, gender expression Sexual orientation Marital status Medical Condition (genetic characteristics, cancer or a record or history of cancer) Military or veteran status National origin Ancestry Disability (mental and physical including HIV/AIDS, cancer, and genetic characteristics) Genetic information Age (over 40) Request for family care leave Request for Pregnancy Disability Leave Retaliation for reporting patient abuse in tax-supported institutions	Directly from you	To provide services to you To administer policies or process claims
Commercial Information	Records of personal property, products or services purchased, obtained, or considered Other purchasing or consuming histories or tendencies. Type of work performed	Directly from you	To place insurance on your behalf To provide, maintain, protect and personalize our services including our insurance products, consulting and broking services

	Quantity of services performed		
Internet Information	Electronic network activity information over time and across third party websites or online services Browsing history Search history Information regarding interaction with a website, application, or advertisement	Automatically, such as when you visit our website	To send promotional offers and advertisements regarding our products / services To engage in marketing To include you in our email newsletter and messaging campaigns To operate, evaluate and improve our website To track your time on our website and pages visit To provide customer service, security, and detect, prevent and mitigate fraudulent, harmful or illegal activities To assist us with product experience and compliance-related activities See Cookies disclosures below
Geolocation Data	Internet protocol address Security cameras		To send promotional offers and advertisements regarding our products/services To engage in marketing To operate, evaluate and improve our website To track your time on our website and pages visit To provide security, and detect, prevent and mitigate fraudulent, harmful or illegal activities See Cookies disclosures below
Audiovisual Information	Electronic information (e.g., meeting recordings) Visual information (e.g., camera footage)	Directly from you	For placing and servicing insurance policies
Professional or Employment-Information	Professional history Employment history	Directly from you	To consider you for employment with us during the hiring process
Education Information	Educational history	Directly from you	To consider you for employment with us during the hiring process

SENSITIVE PERSONAL INFORMATION			
Sensitive Personal Identifiers	Social security number Driver's license number State identification card number	Directly from you	Provide services to you To administer policies or process claims To provide, maintain, protect and personalize our services including our insurance products, consulting and broking services To deal with your inquiries and requests To cooperate with regulators and law enforcement bodies
Health Information	Health and medical details (e.g., health certificates)	Directly from you	For placement of health insurance business
Precise Geolocation	Geofencing	Automatically, such as when you visit our website	To comply with laws and regulations For privacy concerns For security purposes, including addressing malicious bot traffic

* See the section entitled Online Technologies below.

We only use Sensitive Personal Information for purposes disclosed herein. We do not use or disclose Sensitive Personal Information for purposes other than those specified herein.

We are in possession of de-identified data. We commit to maintain and use such data without attempting to re-identify the data.

3. Online Technologies.

We use certain online technologies on our website.

For example, we use cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. We use cookies or similar technologies, such as web beacons and tracking pixels to analyze trends, administer our website, personalize content and ads, track users' movements around our website to provide you with the most relevant browsing experience, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or of the service we provide as some of our features or services may not function properly without cookies.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Functionality / preference cookies.** These are used to recognize you when you return to our website. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Statistical, analytical or performance cookies.** These allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Marketing / targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We may use this information to make our website and the advertising displayed on it more relevant to your interests.
- **Third party cookies.** These cookies are placed on your device by a website from a domain other than our website. Please note that various third parties may also use these types of cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies are likely to be analytical cookies or performance cookies or targeting cookies.

If you want to remove existing cookies from your device you can do this using your browser options. If you want to block future cookies being placed on your device you can change your browser settings to do this. Please bear in mind that deleting and blocking cookies may have an impact on your user experience as parts of the site may no longer work. Unless you have adjusted your browser settings to block cookies, our system may issue cookies as soon as you visit our site or click on a link in a targeted email that we have sent you, even if you have previously deleted our cookies.

In addition, we use web beacons and pixels, which are images that can be placed in web pages and some forms of email. These technologies can be used to deliver cookies and to collect information about your use of the site. Finally, we may also collect information through tracking pixels. A tracking pixel is a transparent graphic image (usually 1 pixel x 1 pixel or Javascript tag) that is placed on a web page and, in combination with a cookie, allows us to collect information regarding the use of the page of the site that contains the tracking pixel. We may use tracking pixels to trigger ads on participating websites based on activity tracked from the browser on a device used to visit our Sites. Other entities may have access to some of this information.

By using your website and services you affirmatively agree to the use of cookies disclosed in this Privacy Policy.

4. Personal Information We Disclose, Share for Targeted Advertising or Sell and the Purpose for It.

Disclosure of Personal Information to Service Providers

We may disclose your Personal Information with our service providers and business partners that perform marketing services and other business operations for us. For example, we may partner with other companies to process secure payments, fulfill orders, optimize our services, send newsletters and marketing emails,

support email and messaging services and analyze information. The following sets forth the categories of Personal Information we have disclosed to our service providers for a business purpose over the past 12 months.

- **Personal Information**
 - Personal Identifiers
 - Protected Characteristics
 - Commercial Information
 - Internet Information
 - Geolocation Data
 - Audiovisual Information
 - Professional or Employment-Information
 - Education Information
- **Sensitive Personal Information**
 - Sensitive Personal Identifiers
 - Health Information
 - Precise Geolocation

In the preceding 12 months, we have disclosed the foregoing categories of Personal Information to our service providers for the following business purposes. Please note that we may not have disclosed each of the foregoing categories of Personal Information for every purpose listed below.

- **Auditing of Ad Impression:** We disclose Personal Information for auditing purposes related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- **Security and Fraud Detection:** We disclose Personal Information for our security and fraud detection services including detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity; and prosecuting those responsible for that activity.
- **Functionality & Debugging:** We disclose Personal Information to engage in debugging to identify and repair errors that impair existing intended functionality.
- **Services on Our Behalf:** We disclose Personal Information in order to receive services performed on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf.

Selling and Sharing (for Cross Context Behavioral Advertising) of Personal Information

We do not sell your Personal Information as that term is commonly understood to be disclosure of your Personal Information in exchange for money. Rather, as used herein, definition of sale includes situations where another company can use your Personal Information for its own purposes. Please see the Tracking Technologies section above.

We may also share with others certain Personal Information we have collected from you for cross-context behavioral advertising (targeted advertising).

In the past 12 months, we have sold or shared (as defined above) Identifiers, Internet Information, Geolocation Data, Professional or Employment Information and Precise Geolocation to third party advertising and marketing partners for advertising purposes, marketing purposes and analytics purposes.

As Necessary

We may also disclose Personal Information, as necessary: (a) to comply with any legal process; (b) to respond to requests from public and government authorities; (c) to enforce our terms and conditions; (d) to protect our operations and protect our rights, privacy, safety or property, and/or that of you or others; and (e) to allow us to pursue available remedies or limit the damages that we may sustain. We may also use Personal Information in connection with or during negotiation of any reorganization, acquisition, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Other Disclosures

We work closely with other businesses and companies that fall under The Hilb Group, LLC, its affiliates and subsidiaries. We may disclose your Personal Information with other The Hilb Group, LLC companies for internal, marketing and other purposes.

We use third party advertising companies to place ads. We do this by allowing our advertising and social media partners to place their cookies on a browser of an individual who visits our sites. The data received by our third party advertising and social media partners allows them to measure the effectiveness of such advertising and to provide advertisements on other websites about our services which are tailored to your interests.

We use Google Analytics to ensure website functionality and improve our website and services. This software may record information such as your IP address, location, age and gender, browser type and language, operating system, access time, duration of visit, pages you view within our website, search terms you enter and other actions you take while visiting us, the pages you view immediately before and after you access the services, how often you use our Services, aggregated usage and performance data, app errors and debugging information. Google Analytics is owned and controlled by Google LLC. Data collected by Google is subject to its privacy policy. To learn how Google uses data related to website analytics, please click [here](#). You may opt-out of having your activity on our website made available to Google Analytics by installing the Google Analytics browser add-on, available [here](#).

Under California law, the disclosure of data received by our third-party advertising and social media partners may be considered a sale of Personal Information.

We do not have actual knowledge that we sell or share the Personal Information of consumers under 16 years of age.

5. Our Retention Policy – How Long We Keep Your Personal Information.

We will retain each category of your Personal Information identified above for an amount of time that is reasonably necessary for us to use the information for the purposes disclosed herein and for any other permitted purposes, including retention of Personal Information pursuant to any applicable contract, law or

regulation. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

6. Information Security and Storage.

We implement technical, organizational, administrative and physical measures to help ensure a level of security appropriate to the risk to the Personal Information we collect, use, process and disclose. These measures are aimed at ensuring the on-going integrity and confidentiality of Personal Information. We evaluate these measures on a regular basis to help ensure the security of the processing. Please be aware that, despite our ongoing efforts, no security measures are perfect or impenetrable.

7. Children.

Our services are directed towards adults. We do not direct our websites or applications to children under thirteen (13) years of age. We do not knowingly collect information from persons under 13 years of age or provide any Personal Information from such persons to any third party for any reason whatsoever. We do not allow persons known to be under 13 years of age to receive direct marketing communications from us. No information should be submitted to our websites or applications by persons under 13 years of age. When appropriate, we may ask you to indicate your date of birth to verify compliance with the age requirements set forth herein. If we are notified that we have collected personal information, as defined by the Children's Online Privacy Protection Act ("COPPA"), of a child under the age of 13, we will delete the information as expeditiously as possible.

8. Consumer Rights.

Your Rights if You Are a Resident of California.

California residents may exercise certain privacy rights pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2023, and related regulations. Your right to submit certain requests as a California resident are described below. Please note that these rights are subject to certain exceptions and certain of these rights are subject to verification mechanisms.

- **Right to Know Personal Information Collected About You.** You have the right to know: (1) the categories of Personal Information we have collected about you; (2) the categories of sources from which the Personal Information is collected; (3) the business or commercial purpose for collecting, selling, or sharing Personal Information; (4) the categories of third parties to whom we disclose Personal Information; and (5) the specific pieces of Personal Information we have collected about you. You also have the right to know the list of all third parties to whom we have disclosed Personal Information, as defined under California Civil Code Section 1798.83(e) (a/k/a the "Shine the Light Law"), during the preceding year for third-party direct marketing purposes.
- **Right to Know Personal Information Disclosed, Sold or Shared and to Whom.** You have the right to request that we disclose to you: (1) the categories of Personal Information that we collected about you; (2) the categories of Personal Information that we sold or shared about you and the categories of third parties to whom the 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; and (3) the categories of Personal Information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

- **Right to Request Deletion of Your Personal Information.** You have the right to request that we delete your Personal Information, subject to a number of exceptions. Following receipt of a request, we will let you know what, if any, Personal Information we can delete from our records. If we cannot delete all of your Personal Information, we will let you know the reason.
- **Right to Correct Inaccurate Information.** If you believe that any of the Personal Information we maintain about you is inaccurate, you have the right to submit a request for us to correct that information. Upon receipt of a request, we will use commercially reasonable efforts to correct the information as you direct.
- **Right to Opt-Out of the Sale and Sharing of Your Personal Information.** You may opt-out of the sale or sharing of your Personal Information, to the extent applicable, by clicking [here](#).
- **Right to Limit the Use of Your Sensitive Personal Information.** You have the right to limit the use of Sensitive Personal Information under circumstances. Given our data practices, this right does not apply to you.
- **Right to Non-Discrimination for Exercising Your Rights.** If you choose to exercise any of your rights, you have the right to not receive discriminatory treatment by us.

Your Rights If You Are a Resident of Texas

If you are a resident of Texas, you have the following rights. Please note that these rights are subject to certain exceptions and certain of these rights are subject to verification mechanisms.

- **The Right to Know:** You have the right to know whether we are processing your Personal Information.
- **The Right of Access:** You have the right to access your Personal Information, and to obtain a copy of it in a readily usable format, if feasible.
- **The Right to Correct Inaccuracies:** You may request that inaccuracies in your Personal Information be corrected.
- **The Right to Delete:** You have the right to request that your Personal Information be deleted, except in cases where retention is required by law or contractual obligation.
- **The Right to Data Portability:** You have the right to obtain a copy of your data in a portable and, if feasible, readily usable format.
- **The Right to Opt-Out:** You may elect to prevent your Personal Information, to the extent applicable, from being:
 1. Used in targeted advertising;
 2. Sold;
 3. Used for profiling purposes that may produce legal or similarly significant effects.
- **Rights Regarding Sensitive Personal Information:** In connection with your Sensitive Personal Information, we will not process Sensitive Personal Information without obtaining your consent. You

have the right to withdraw your previous consent and opt out of further processing of your Sensitive Personal Information.

How to Make a Consumer Requests

For California residents: (a) you can exercise your rights to opt-out of the selling and/or sharing of your Personal Information (to the extent applicable to you) by (i) clicking the link provided above or (ii) enabling the setting in a browser that supports an opt-out preference signal (also known as universal opt-out mechanisms); and (b) for requests to know, correct and/or delete (to the extent applicable to you), you can make a request by sending us an email at privacy@hilbgroup.com or by calling us at 800-777-2573.

For Texas residents, you can exercise your rights to opt-out (to the extent applicable to you) through an opt-out preference signal (also known as universal opt-out mechanisms) or (to the extent a right is applicable to you) by sending us an email at privacy@hilbgroup.com or by calling us at 800-777-2573.

When you make certain requests (e.g., a request to know, delete and/or correct; or a request for access or data portability), to help protect your privacy and maintain security, we will take steps to verify your identity. Our verification procedure may differ depending on whether you have an account with us or not and the request you are making. The following generally describes the verification processes we use:

- **Password Protected Accounts.** If you have a password-protected account with us, we may use existing authentication practices to verify your identity but will require re-authentication before disclosing, correcting or deleting data. If we suspect fraudulent or malicious activity relating to your account, we will require further verification (as described below) before complying with the request.
- **Verification for Non-Accountholders.** If you do not have, or cannot access, a password-protected account with us, we will generally verify your identity as follows:
 - For valid requests to know categories of Personal Information, we will verify your identity to a reasonable degree of certainty by matching at least two data points provided by you with reliable data points maintained by us.
 - For valid requests to know specific pieces of Personal Information, right of access and right to data portability, we will verify your identity to a reasonably high degree of certainty by matching at least three data points provided by you with reliable data points maintained by us.
 - For valid requests to correct or delete Personal Information, we will verify your identity to a reasonable degree or a reasonably high degree of certainty depending on the sensitivity of the Personal Information and the risk of harm posed by unauthorized deletion. We will act in good faith when determining the appropriate standard to apply.

We may also require a declaration, signed under penalty of perjury, that the person requesting the information is the person whose information is the subject of the request or that person's authorized representative.

If there is no reasonable method by which we can verify your identity, we will state so in response, including an explanation of why we have no reasonable method to verify your identity.

If you use an authorized agent to submit a request to know, delete or correct, we may require the authorized agent to provide proof that you gave the agent signed permission to submit the request. We may also require

you to do either of the following: (a) verify your own identity directly with us; or (b) directly confirm with us that you provided the authorized agent permission to submit the request.

There may be situations where we cannot grant your request. For example, if you ask us to delete Personal Information that we are obligated to keep to comply with applicable law we may not be able to fulfill some or all of your request. We may also decline to grant your request where our use of your Personal Information serves a legitimate purpose such as for security purposes. Your request may also be denied if it compromises the privacy of others, is overly repetitive or extremely burdensome to fulfill.

We will respond to valid requests to know, requests to correct and / or delete no later than 45 calendar days. If we cannot verify your request within 45 days, we may deny your request. If necessary, we may take up to an additional 45 days to respond to your request but in such an event will provide you a notice and an explanation of the reason that we will take more than 45 days to respond to your request.

Valid requests under “Right of Access” and “Right to Data Portability” will be transmitted securely. If we cannot fulfill your request, we will notify you of that decision and the reasons why within 45 days. At that point if you believe our decision was in error, you may have the right to submit an appeal using the method(s) above. If the result is the same, you can also seek assistance and/or redress from your state attorney general.

9. Nevada Privacy Notice.

Nevada law provides that Nevada residents may opt-out of the “sale” of “covered information” to third parties, including but not limited to name, address, social security number, and online service activity. Our uses of your Personal Information are not sales under Nevada law, so no opt-out right applies.

10. Links to Other Sites.

We may provide links to other websites not owned or controlled by us that we think might be useful or of interest to you. We are not, however, responsible for the privacy practices used by other website owners or the content or accuracy contained on those other websites. Links to other websites do not constitute or imply endorsement by us of those web sites, any products or services described on those websites or any other material contained in them. We advise that you contact any third-party websites directly for their individual privacy policies.

11. How to Contact Us.

If you have any questions or concerns about our privacy policies and practices, please feel free to contact us by calling us at 800-777-2573 or emailing us at privacy@hilbgroup.com.