### **RAINBOW PRIVACY POLICY**

Last Updated and Effective Date: October 10, 2022

This Privacy Policy explains how Rainbow MGA Insurance Agency, Inc. and its subsidiaries and affiliated companies ("*Rainbow*," "we," or "us") collects, uses, and discloses information about you. This Privacy Policy applies when you use our website and website-based application, request an insurance quote or receive insurance coverage from us (collectively, our "Services"), apply to be an agent, contact us, apply for a job, work for us as an employee, or otherwise interact with us.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website or sending you a notification). We encourage you to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

Please note that our Services and this Privacy Policy are directed only to users in the United States. Rainbow currently does not meet the requirements to be subject to comprehensive data privacy laws in the United States.

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# **COLLECTION OF INFORMATION**

#### **Information You Provide to Us**

We collect information you provide directly to us. For example, you share information directly with us when you create an account, request an insurance quote, apply for a job, or otherwise communicate with us. The types of personal information we may collect include your name, email address, postal address, phone number, criminal history, information regarding your restaurant and business, information contained in your resume and other information about your qualifications and credentials, demographic information, information collected during the course of your employment with us, and any other information you choose to provide.

### **Information We Collect Automatically When You Interact with Us**

When you access or use our Services or otherwise transact business with us, we automatically collect certain information, including:

- **Transactional Information:** When you purchase insurance coverage, we collect information about the transaction, such as policy details, policy price, and the date and location of the transaction.
- Device and Usage Information: We collect information about how you access our Services, including
  data about the device and network you use, such as your hardware model, operating system version,
  mobile network, IP address, unique device identifiers, browser type, and app version. We also collect
  information about your activity on our Services, such as access times, pages viewed, links clicked, and
  the page you visited before navigating to our Services.
- Information Collected by Cookies and Similar Tracking Technologies: We (and our service providers) use analytics cookies to monitor your interaction with our website and our Services. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as "pixel tags" or "clear GIFs") are electronic images that we use on our Services and in our emails to help deliver cookies, count visits, and understand usage and campaign effectiveness. You can opt-out of non-essential cookies through your browser settings.

#### **Information We Collect from Other Sources**

We obtain information from third-party sources. For example, we may collect information about you from identity verification services, credit bureaus, advertising networks, data analytics providers, and mailing list providers. Additionally, if you create or log into your Rainbow account through a third-party platform (such as Facebook or Google), we will have access to certain information from that platform, such as your name, birthday, and profile picture, in accordance with the authorization procedures determined by such platform.

We may also collect information from your employer, including your name, address, driver's license number, date of birth, and gender.

## **USE OF INFORMATION**

We use the information we collect to generate an insurance quote for you and communicate with you regarding your insurance coverage. We also use the information we collect to:

- Provide, maintain, and improve our Services;
- Appoint agents in connection with our Services;
- Process transactions and send you related information, including confirmations and receipts;
- Conduct business dealings with our partners and service providers;
- Respond to your comments and questions and provide customer service;
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Process your job application and determine your eligibility for certain jobs and benefits;
- Maintain your employment records and provide human resources and benefits;
- Personalize the advertisements you see on third-party platforms and websites (for more information, see the Analytics section below);

- Personalize the advertisements you see when you use our Services based on information provided by our advertising partners;
- Detect, investigate, and prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of Rainbow and others;
- Debug to identify and repair errors in our Services;
- Comply with our legal and financial obligations; and
- Carry out any other purpose described to you at the time the information was collected.

### SHARING OF INFORMATION

We share personal information in the following circumstances or as otherwise described in this policy:

- We share personal information with vendors, service providers, and consultants that need access to
  personal information in order to perform services for us, such as companies that assist us with web
  hosting, payment processing, fraud prevention, marketing and advertising, and human resources.
- We may disclose personal information if we believe that disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements.
- We may share personal information if we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of Rainbow, our users, the public, or others.
- We share personal information with our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.
- We may share personal information in connection with, or during negotiations concerning, any
  merger, sale of company assets, financing, or acquisition of all or a portion of our business by
  another company.
- Personal information is shared between and among Rainbow and our current and future parents, affiliates, and subsidiaries and other companies under common control and ownership.
- We share personal information with your consent or at your direction.

We also share aggregated or de-identified information that cannot reasonably be used to identify you.

# DO NOT TRACK SIGNALS

We do not currently respond to "do not track" signals on this website.

## **ANALYTICS**

We allow others to provide analytics services on our behalf across the web. These entities may use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked, and conversion information. This information may be used by Rainbow and others to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity.

## **YOUR CHOICES**

#### **Account Information**

You may update and correct certain account information at any time by logging into your account or emailing us at <a href="mailto:privacy@userainbow.com">privacy@userainbow.com</a>. If you wish to delete your account, please email us at <a href="privacy@userainbow.com">privacy@userainbow.com</a>, but note that we may retain certain information as required by law or for our legitimate business purposes.

#### **Cookies**

Most web browsers are set to accept cookies by default. If you prefer, you can usually adjust your browser settings to remove or reject browser cookies. Please note that removing or rejecting cookies could affect the availability and functionality of our Services.

#### **Communications Preferences**

You may opt out of receiving promotional emails from Rainbow by following the instructions in those communications. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

### **CHILDREN**

This website is not intended for or directed at children under the age of 18. In addition, we do not knowingly collect personal information from children under the age of 18. Any information that is inadvertently collected from children will be deleted promptly upon discovery. If you are a parent or legal guardian and think your child under 18 has given us personal information, you can email us at privacy@userainbow.com.

### **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at <a href="mailto:privacy@userainbow.com">privacy@userainbow.com</a>. You can also write to us at:

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