

NOTICE OF INFORMATION PRACTICES

PEMCO appreciates the trust you place in us when you purchase insurance from us, and we value you as a customer. Your privacy is important to us, and we're committed to protecting your nonpublic personal information ("personal information" or "information"). This Privacy Notice applies to PEMCO Mutual Insurance Company (PEMCO) and to PEMCO Insurance Agency.

This notice describes how we protect, collect, use, and share customer information. This information is often called nonpublic personally identifiable information because it is nonpublic information related to an identified individual. It does not include anonymized data or de-identified data which do not describe the identity of an individual.

To learn more about how we collect and use information about you, please read the following notice.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

You provide most of the information we need during the application process, either through your agent, online or on the phone. We ask for information such as your name, address, email address, phone number, driver's license, social security number, date of birth, gender, marital status, and type of vehicle you drive. We also ask about people in your household.

In addition, we may obtain other information, including but not limited to the following:

- We may obtain information from consumer reporting agencies and insurance support organizations to evaluate your insurance risk, including your credit-based insurance score. These reporting agencies may retain your information and they may disclose it to others.
- We also may gather information from consumer reporting agencies, insurance support organizations, your past insurers, transactions with our affiliate(s) and/or government agencies. This can include your past policies and claims history, driving record, transactions such as payment history, coverage levels, possible drivers and vehicles associated with your household, and odometer readings associated with any of your vehicle(s).
- For property insurance policies, we get information about your property from third-party reports, and we may ask an independent inspector to visit your property to inspect its condition. We may also use geospatial information and take pictures or a video of your property. Sometimes we may need to schedule an interior inspection.
- The mobile app used for our My Driving Discount program collects location data in order to evaluate your driving even when the app is closed or not in use.

In some instances, we may need to know about your health. For example, if we need to know whether a physical limitation will affect your ability to drive, we may ask for a statement from your doctor. We may also need this information to adjust your claim or to detect and prevent fraud. We will not share your medical information with our affiliates or non-affiliates unless you specifically authorize us to share or if we are permitted or required to by law.

We treat your information confidentially whether you are an applicant, a customer, or a former customer.

HOW WE USE YOUR INFORMATION

We use your information to underwrite and rate your policy and to process your claims. We only disclose personal information about you as permitted by law. Generally, this includes sharing it with third parties to administer your transactions with us, service your insurance policy or claim, detect and prevent fraud, or with your authorization. We require parties with whom we share your information to use your personal data only for the reasons we shared it with them. These third parties may include:

- Insurance support organizations, consumer reporting agencies or other insurance companies

(including for the detection and prevention of fraud);

- Independent insurance producers authorized to sell PEMCO insurance products;
- Independent contractors (such as automobile repair facilities, towing companies, property inspectors and independent claims representatives);
- Auditors, attorneys, courts and government agencies;
- Other companies which may reinsure your policy or with which you have other coverage;
- Other companies and insurance support organizations for actuarial or research studies;
- Other companies that perform marketing services on our behalf or with financial institutions with which we have joint marketing agreements for products offered by PEMCO;
- Courts or governmental entities in response to a judicial process or government regulatory authority who has jurisdiction over us or for other purposes permitted by law.

We also use your information to perform our own research, testing and product development, or for our own actuarial analysis to develop actuarial and pricing models.

Information about our transactions with you (such as payment history) and experiences (such as claims made) may be shared with our affiliates.

ADDITIONAL INFORMATION FOR PARTICIPANTS IN TELEMATICS PROGRAMS

Additional information for policyholders enrolled in our telematics program(s) is included in the endorsement(s) provided upon enrollment in the program(s).

PROTECTING YOUR INFORMATION FROM UNAUTHORIZED ACCESS

Protecting your privacy is important to us. We maintain physical, electronic, and administrative safeguards to protect your information from unauthorized access and comply with applicable federal and state regulatory standards. Our employees are authorized to access customer information only for legitimate business purposes and are required to maintain the confidentiality of your personal information. Our employees review and agree to follow our Code of Ethics, which includes the expectation that employees honor the privacy of our customer information.

INDEPENDENT PEMCO INSURANCE AGENTS

The independent insurance agents (producers) authorized to sell PEMCO products are not PEMCO employees and are not subject to PEMCO's privacy policy. Because they have a unique business relationship with you, they may have additional personal information about you that PEMCO does not have. They may use this information differently than PEMCO. Contact your PEMCO agent to learn more about their privacy practices.

We may modify this Privacy Notice from time to time. If we make changes, the most recent revision date will appear at the bottom of the Privacy Notice.

Our contact information:

PEMCO Mutual Insurance Company
1300 Dexter Ave. N.
Seattle, WA 98109

1-800-467-3626

How you can review your personal information in our records

To review your personal information in our records, send a written request to us at P.O. Box 778, Seattle, Washington 98111-0778, Attention: Records Request. The requested information will need to be reasonably described and reasonably locatable and retrievable.

Within 30 business days of receiving your written request, we will advise you what information is available. A copy of the information can be mailed to you. We will also name anyone we show as having received the information within two years prior to your request, as well as identify institutional sources that have provided personal information about you.

There are certain types of information, such as information collected when we evaluate a claim or when the possibility of a lawsuit exists, that we are not required to provide.

If you disagree with our records

To correct, amend, or delete information about you, send a written notice as described above explaining your request. Within 30 business days, we will either make the requested change or explain why we disagree. If a change is made, it will become part of the file. It will be included in any future disclosures to others and will be sent to:

- Anyone you designate who may have received the information during the previous two years.
- Any insurance support organization who may have received the information from us during the previous seven years, unless the information is no longer maintained.
- Any insurance support organization that provided the information that was corrected, amended, or deleted pursuant to your request.

If we disagree with you, you can provide us with a concise written statement explaining why you believe the information is wrong. This statement will become part of your file and will be included in any future disclosures of the disputed subject matter. Your statement will also be sent to the persons listed above.