



THE MAIN STREET AMERICA GROUP



## PRIVACY POLICY

*(Last Updated: September 2018)*

Thanks for using Main Street America Group. Main Street America Group's website available at [www.msagroup.com](http://www.msagroup.com) is owned and operated by Main Street America Group, Inc. ("MSA," "we" or "us"). MSA provides insurance services.

MSA is committed to your privacy. This Privacy Policy explains how we collect, use, disclose, retain and protect your personal information in connection with our services.

### Introduction

This Privacy Policy, together, with our Terms and Conditions, applies to our applications, various websites (including [www.msagroup.com](http://www.msagroup.com)), widgets, email notifications, and other mediums, or portions of such mediums, including online and offline services and products (collectively, our "Services"), through which you have accessed this Privacy Policy. This Privacy Policy and our Terms and Conditions describe the types of personally identifiable information and non-personally identifiable information that you provide to us or that we collect from you in connection with the provision of our Services ("Your Information").

Please read this Privacy Policy and our Terms and Conditions carefully. By accessing or using our Services, you consent to the collection, transfer, manipulation, storage, disclosure, processing and other uses of Your Information as described in this Privacy Policy. If you do not want Your Information used or disclosed in the manner described in this Privacy Policy, then you should not use our Services or provide us with Your Information. To the extent that this Privacy Policy conflicts with our Terms and Conditions, this Privacy Policy will apply and control.

This Privacy Policy does not apply to the following information:

- Information collected by anyone other than us (even if related to our business).
- Information collected by us where a separate privacy policy applies.
- Non-personally identifiable information, which, standing alone, cannot be used to determine your identity. However, if we link such non-personally identifiable information with Your Information in a manner that can be used to determine your identity, then this Privacy Policy will apply.
- Unsolicited information that you provide to us through the Services or through any other means, including information posted to any public areas of our Services, such as bulletin boards, any ideas for new products or modifications to existing products or services, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information is deemed to be non-confidential and we are free, and you hereby grant us the right, to reproduce, use, disclose and distribute such Unsolicited Information to others without limitation or attribution.

### Information We Collect and How We Collect It

#### Information You Provide to Us Directly

When you register with or otherwise use our Services, we may require Your Information, such as your name, email, phone number, company name and other information that may help us improve our Services. We may require additional information to provide you with Our Services, including certain additional information in connection with filling out a claim or consumer affairs complaint. If you choose

not to provide us with any requested information, you may not be able to use some or all of the features of our Services.

### Information that You Generate Using Our Communications Features

Our Services may allow you to communicate or share information with us. You expressly acknowledge and agree that we may access in real-time, record and store archives of these communications (including any call or message data, such as the date, time and content of such call or message and the applicable phone numbers) on MSA's servers to make use of them in connection with our Services.

### Information We Collect Automatically

When you use our Services, we and service providers acting on our behalf may use technology to collect information about you, including your location, IP address, browser type, ISP, referral and exit pages, clickstream data, pages visited, time of visits and information related to your device, such as hardware models and IDs, device type, operating system version, the request type, the content of your request and basic usage information about your use of our Services, such as date and time. We may also collect and store information locally on your device using mechanisms, such as browser web storage and application data caches.

We and service providers acting on our behalf may collect such information through a variety of technical methods, including sending cookies, web beacons, pixel tags and other anonymous identifiers to your device. "Cookies" are pieces of data stored on our computer, mobile phone or other device. A "web beacon" is a type of technology that lets us know if you visited a certain page or whether you opened an email. A "pixel tag" is a type of technology placed within a website or email for the purpose of tracking activity, which is often used in combination with cookies. Other "identifiers" are random strings of characters used for the same purposes as cookies, such as with mobile devices where cookie technology is not available. These technologies help us provide you with features based on your preferences, understand when you are interacting with our Services, and compile other information regarding your use of our Services.

Please note that, in most cases, you can stop making your location available to us or remove or block cookies (such as by using the settings in your browser), but doing so may affect your ability to use our Services.

### Third-Party Content

Some content or applications, including advertisements, on our Services may be served by third parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may collect information about you when you use our Services. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about any targeted content, you should contact the responsible provider directly.

### **How and Why We Use Your Information**

We may use Your Information for various lawful business purposes. Among others, below are some specific examples of these purposes:

- Provide our Services to you. We strive to ensure our Services meet the high standards that you would expect of MSA. For example, we might verify information that you provide to us and provide you with administrative notices.

- Contact you and provide you with information. For example, we might contact you through telephone, email, postal, notifications, text messages or other communications, where permitted by applicable law, to provide you with Service updates, promotional materials, surveys, offers, quotes, personalized information and other information from us or our business partners.
- Analyze, improve and manage our Services and operations. For example, we might obtain feedback regarding our Services to understand and anticipate your needs and preferences, better understand your use of our Services, customize and tailor Service content, improve our marketing and promotional efforts, engage in statistical analysis and provide feedback or information to our business partners, vendors, advertisers and other third parties.
- Resolve problems and disputes, and engage in other legal and security matters. For example, we may use Your Information to comply with, monitor compliance with and enforce this Privacy Policy, our Terms and Conditions, and any other applicable agreements and policies, as well as meet other legal and regulatory requirements and protect the security and integrity of our Services.
- Other Purposes. We may also use Your Information in other ways. To the extent required by applicable law, we will provide notice at the time of collection and obtain your consent. For instance, if you apply for a job, we may collect Your Information in order to process your job application.

## **How We Disclose Your Information**

We may disclose Your Information:

- To any person who, in our reasonable judgment, is authorized to receive Your Information as your agent, including as a result of your business dealings with that person (for example, your attorney);
- To our third-party vendors so that they may provide support for our internal and business operations (“Our Vendors”), including for payment or data processing, data verification, data storage, surveys, research, internal marketing, delivery of promotional and marketing materials and our Services’ maintenance and security;
- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide Your Information to us;
- With your consent;
- To third parties that are interested in contacting you or providing offers to you that may be related to our services that you may find of interest;
- To third parties whose websites or applications we may link to through our Services, if you choose to click on the third-party links;
- As required by law or ordered by a court, regulatory or administrative agency;
- As we deem necessary, in our sole discretion, if we believe that you are violating any applicable law, rule or regulation, or are otherwise interfering with another’s rights or property, including our rights or property;
- If requested by authorities in the event of any act or instance of local, regional, national or international emergency;
- To enforce our Terms and Conditions, this Privacy Policy and any other applicable agreements and policies;
- To enforce or protect our rights;

- In connection with a business transfer (as described in the section titled *Business Transfers* below); and
- To our affiliated companies (for example, companies under common control or management with us).

Please note that the list above is not exhaustive and that we may, in our sole discretion, to the extent permitted by applicable law, share, loan, rent, sell or otherwise disclose information we collect from you to third parties at any time, for any lawful purpose, without notice or compensation to you.

If we disclose Your Information to third parties, Your Information will become permanently subject to the information use and sharing practices of the third party. We have taken steps to ensure that such third parties respect Your Information, but please be aware that we make no guarantee whatsoever in connection with how such third parties use, disclose and treat Your Information and such third parties may further disclose, share and use Your Information. By submitting Your Information to us, you expressly consent to such disclosure and use of Your Information. If you do not want Your Information shared as described above, then you should not provide us with Your Information.

#### Aggregation and De-Personalization

We may take Your Information and de-identify it either by combining it with information about other individuals (aggregating Your Information with information about other individuals), or by removing characteristics (such as your name) that make Your Information personally identifiable to you (de-identifying Your Information). We reserve the right to share, loan, rent, sell or otherwise disclose such information to third parties at any time, for any lawful purpose, without notice or compensation to you.

#### Circumvention of Security Measures

We use a variety of technical, administrative and organizational security measures to keep Your Information safe. However, despite our efforts, please be aware that methods of transmission and electronic storage are not completely secure. We cannot guarantee the privacy or security of Your Information or any voice or data transmissions, as third parties may unlawfully intercept or access transmissions or electronic storage. Further, to the extent permitted by applicable law, we are not responsible for circumvention of any privacy settings or security measures of our Services. Therefore, you use our Services at your own risk, you should not expect, that Your Information or voice or data transmissions will always remain private, and we do not guarantee the performance or adequacy of our privacy settings or security measures. In the event that an unauthorized third party compromises our security measures, to the extent permitted by applicable law, we will not be responsible for any damages, directly or indirectly, caused by an unauthorized third party's ability to view, use or disseminate Your Information.

#### Business Transfers

We specifically and expressly reserve the right to disclose, lease, sell, assign or transfer Your Information to a buyer or other successor in the event of a sale, acquisition, merger, consolidation, reorganization, bankruptcy, dissolution or other corporate change involving our business, even if such event is only being contemplated and regardless of whether such event relates to a part or the whole of our business. Nothing in this Privacy Policy is intended to interfere with our ability to transfer all or part of our business, equity, or assets to an affiliate or independent third party at any time, for any lawful purpose, without notice or compensation to you.

## **How Long Do We Retain Your Information**

We will retain Your Information for the period necessary to fulfill the purposes for which Your Information has been collected as outlined in this Privacy Policy, unless a longer retention period is required by applicable law.

## **Your Information that You Disclose to Third Parties**

This Privacy Policy applies only to our Services, and not to websites, online services or applications owned by third parties. Our Services may contain links to other websites, online services or applications. We are not responsible for the privacy policies and other practices of such third parties, or the accuracy or quality of the services of such third parties. Any information that you disclose to third parties will be subject to the privacy policies and practices of such third parties. You should review the privacy policies and practices of such third parties prior to disclosing information to them. If you have any questions about how these third parties use your information, you should review their policies and contact them directly.

## **Operations of Our Services in the United States**

Our Services are operated in the United States. Your Information may be processed by us in the country where it was collected as well as other countries (including the United States) where laws regarding processing of Your Information may be less stringent than the laws in your country.

## **Children's Information**

If you are below the age of 18, you may only download, install, access or use our Services under the supervision of a parent or legal guardian who agrees to be bound by this Privacy Policy and our Terms and Conditions.

We do not knowingly collect personally identifiable information from children under 18. If we learn that we have inadvertently gathered personal information from a child under 18, we will take reasonable measures to promptly remove that information from our records.

## **Changes to this Privacy Policy**

We may update, amend or change this Privacy Policy at any time, in our sole discretion and without notice. Amendments will take effect immediately upon us posting such updates on our Services. If we materially change the way in which we process Your Information, we will provide you with prior notice, or where legally required, request your consent prior to implementing such material changes. We encourage you to periodically check this Privacy Policy for changes, as your continued access and use of our Services following the posting of any changes will automatically be deemed your acceptance of all changes. If you do not agree to any change to this Privacy Policy, you must discontinue using the Services. This Privacy Policy replaces all previous notices or statements with respect to this subject, and cannot be modified orally or in writing by any of our associates, representatives or any other third parties.

## **Questions, Comments or Concerns About this Privacy Policy?**

Our team is always happy to hear from you. We welcome any questions, comments and concerns about this Privacy Policy. If you have questions, comments or concerns regarding this Privacy Policy, or wish to exercise your rights related to Your Information, please contact us at [msalaw@msagroup.com](mailto:msalaw@msagroup.com) or:

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