

# Privacy Policy

## Aria Benefits LL: Terms of Use

This Privacy Policy was last modified on: May 26, 2022

### 1. Introduction

This Privacy Policy applies to Aria Benefits LLC. and its US affiliates,. This Privacy Policy describes our information processing practices in relation to you and your personal data as well as the types of information we may collect when you visit our **Website**, as well as our practice for using, maintaining, storing, and disclosing information you provide to Aria Benefits LL, including personally identifiable information (“Personal Data”). This Privacy Policy also applies to any personal or other information we collect about you from other sources, subject to applicable local law. This Privacy Policy does not apply to any other website operated by Aria Benefits LL or to any website operated by any third party, including any application or content (including advertising) that may link to or be accessible from or on our Website. This Privacy Policy is additional to and does not supplant or supersede our Terms of Use, which can be found [here](#).

In this Privacy Policy, references to “you” mean any person submitting any data, personal or otherwise, on this Website. In this Privacy Policy, Website also refers to our mobile applications, as well as future iterations of our Website and mobile applications. The term “Services” means, collectively, various websites, applications, widgets, email notifications and other mediums, or portions of such mediums, through which you have accessed or may access this Privacy Policy.

Please read this Privacy Policy carefully. If any term in this Privacy Policy is unacceptable to you, please do not use the Website or provide us with any Personal Data. **By accessing or using this Website or our Services, you signify your acknowledgment and consent to the terms of this Privacy Policy and our Terms of Use. This includes your consent to Aria Benefits LL placing cookies on your devices, as described below in our Cookie Policy.**

This Privacy Policy may change from time to time. Visiting this Website or using our Services after we make any changes to this Privacy Policy will be considered

to be an acceptance and consent of those changes. Please check this Privacy Policy periodically for updates.

## **2. What is Personal Data?**

Personal Data generally includes any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means. Personal Data may include information: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an organization intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and/or other descriptors). Additionally, information permitting the physical or online contacting of a specific individual is the same as Personal Data. This information can be maintained in any form.

## **3. Collection of Your Information**

(a) Information you provide directly to us

Aria Benefits LLC may collect Personal Data in order to underwrite, sell, solicit, and negotiate insurance products and services. This includes:

- Your first and last name; phone number (both work and personal); home address; employment address; email address (both work and personal); date of birth; gender; any online profile you may have, including your Facebook, LinkedIn, or Google+ accounts; the last four digits of your social security number, marital status, financial data, educational background, and employment history.
- Information pertaining to your employment or business, including your business name (both its legal name and your “DBA” name); business ownership structure; length of time in business; the type of work you do; the number of employees or contractors you employ; the types of work your subcontractors do; type of work your employees do; estimated payroll (overall business and per employee); the time of day your employees work; employee names; business owners’ and officers’ names (state/location, name, date of birth, title, ownership percentage, duties, class code, payroll); location of workers and employees; concentration of employees and group transportation; employee turnover; employee activities with higher risks, background checks, safety, and hiring; FEIN and other state unemployment identifications

and/or tax identifications; employee age(s); whether employees are seasonal or volunteers; the types of employees you hire; whether you lease or lease out employees; your company's business and other business revenue metrics; the insurance status for workers and subcontractors; the reasons why you may, if applicable, be looking for insurance compensation; and the age of your clients (for tutors); and other information required for underwriting decisions. If the information you provide includes Personal Data of individuals (including your employees), you represent that you have provided notice to that third party and have obtained his or her consent, per Section 3(c), below.

- The amount of time you have worked in your industry.
- The number of vehicles you have, your vehicle identification number(s) (VIN), the address where the vehicle is registered (with the DMV), the address where the vehicle is parked overnight, the name of the vehicle's registered owner, the ownership status of the vehicle (i.e., leased, financed, owned), the name of the leaseholder (if applicable), the primary use of the vehicle and annual miles driven, the year you were first licensed in the United States, any previous auto accidents and/or incidents, your driver's license number.
- Information related to any prior insurance information or prior insurance claims.
- Information related to whether you are licensed to do certain types of work.
- Account history and data that you voluntarily provide us when you create a Aria Benefits LL account.
- Any information you submit to us when/if you get in touch with our customer service team via contact form at Aria Benefits LL, email, chat, phone, or other means.
- Information related to any social media or other online account you may have, such as your public profile and email address connected to those accounts. These companies will be able to tell you more about how they use and process your data.
- Any information you submit when writing a review about the products you have purchased. Please note that submitting an online review of a product is public and generally accessible to, and may be collected and used by, third parties. Aria benefits LLC is not liable for the distribution of Personal Data that is put on a public forum.
- Your events on our Website, such as page views, order information, or information provided when requesting insurance quotes or surveys.
- Information collected using automated technologies, including web server logs that compile IP addresses, web beacons, and cookies.

- Sensitive information, such as your criminal background; criminal background of business owners; credit score; history of bankruptcy, tax, or credit liens; history of lawsuits related to poor workmanship, construction defects, water intrusion, or mold/fungi; and information relating to insurance or employee benefit programs.
- Information online when you visit our Website or access our Services from your computer or other device, or interact with us on or through social media.
- Any other information you voluntarily provide us.
- The amount of time you have worked in your industry.
- The number of vehicles you have, your vehicle identification number(s) (VIN), the address where the vehicle is registered (with the DMV), the address where the vehicle is parked overnight, the name of the vehicle's registered owner, the ownership status of the vehicle (i.e., leased, financed, owned), the name of the leaseholder (if applicable), the primary use of the vehicle and annual miles driven, the year you were first licensed in the United States, any previous auto accidents and/or incidents, your driver's license number.
- Information related to any prior insurance information or prior insurance claims.
- Information related to whether you are licensed to do certain types of work.
- Account history and data that you voluntarily provide us when you create a Aria Benefits LL account.
- Any information you submit to us when/if you get in touch with our customer service team via contact form at Aria Benefits LL, email, chat, phone, or other means.
- Information related to any social media or other online account you may have, such as your public profile and email address connected to those accounts. These companies will be able to tell you more about how they use and process your data.
- Any information you submit when writing a review about the products you have purchased. Please note that submitting an online review of a product is public and generally accessible to, and may be collected and used by, third parties. Aria Benefits LL is not liable for the distribution of Personal Data that is put on a public forum.
- Your events on our Website, such as page views, order information, or information provided when requesting insurance quotes or surveys.
- Information collected using automated technologies, including web server logs that compile IP addresses, web beacons, and cookies.

- Sensitive information, such as your criminal background; criminal background of business owners; credit score; history of bankruptcy, tax, or credit liens; history of lawsuits related to poor workmanship, construction defects, water intrusion, or mold/fungi; and information relating to insurance or employee benefit programs.
- Information online when you visit our Website or access our Services from your computer or other device, or interact with us on or through social media.
- Any other information you voluntarily provide us.

You must only submit to us or the Website information and Personal Data which is accurate and not misleading, and you must keep it up to date and inform us of any changes. For any Personal Data you provide, we are authorized to collect or verify the same or similar information from our affiliates and other third parties, such as employers, insurers, brokers or agents, credit agencies, departments of motor vehicle and driver licensing, financial institutions, healthcare providers, and other sources.

#### (b) Personal Data we collect automatically

When you visit our Website, we may automatically collect certain information, which may also be categorized as Personal Data. This includes your IP address, the date and time you accessed our Services, the hardware, software or internet browser you use and information about your computer's operating system. We might also collect information about clicks, which pages you have been browsing, and any information you have provided us in connection with shopping for or configuring insurance quotes.

#### (c) Personal Data you provide about other individuals

If you provide Personal Data about other individuals, such as your employees or dependents, you must first obtain their consent. By providing us with Personal Data of a third party, you hereby represent that you have provided notice to that third party and have obtained his or her consent. You must provide only accurate information, and refrain from providing information that is not necessary or requested.

When you provide us with personal and other information, you consent to our collection, use, storage, and disclosure of this information to appropriate third parties for the purposes described herein and within our [Terms of Use](#) and Cookies Policy (below).

#### (d) Mobile devices

If you connect to our Services with your mobile device, we may collect certain information automatically, including but not limited to your mobile device's unique device identification, IP address, mobile operating system, internet browsers in use, and location. We also may collect information about the way you use our Services. **Should you choose to provide Aria Benefits LL with your mobile phone number, you consent to the use of your number for the purposes identified in our Terms of Use. If you choose to receive text or other notifications from us on your mobile device, you also consent to the use of your phone number for that purpose.**

#### (e) Public Forums

In providing you with an insurance quote, Aria Benefits LL may search across various public Internet sources about you or your company. Based on this search, Aria Benefits LL reserves the right to adjust your quoted insurance premiums and will bear no liability for the content's accuracy, suitability, legality, or offensiveness. Aria Benefits LL bears no responsibility or obligation to monitor user-generated content but nevertheless reserves the right to remove or edit user-generated information for any reason whatsoever. Should you encounter any issues with user-generated content, please contact us immediately.

#### 4. How We Use Your Personal Data

Aria Benefits LL collects information from you, including Personal Data, for a variety of purposes, as described below (collectively, "Purposes"). This may include to:

- Underwrite, sell, solicit, and negotiate insurance products and services.
- Process your order.
- Contact you regarding your account, your orders, upcoming and/or failed payments, renewals, and endorsements, or for any other important reason. This authorization is without regard to any "do not call" list registry.
- Provide you with a requested quote or offer goods and services of a third-party vendor. When you submit contact information to us as part of an attempted or completed request for a quote or offer for goods and services, you consent to receive telephone calls, emails, text messages, mailers, or other similar communications in connection with these goods and services. This is true even if your phone number is on any "do not call" list.
- Contact you with relation to our Services and products or services offered through our Services if you expressly provide us with your

contact information in connection with our Services or the products or services offered through our Services. This authorization is without regard to any “do not call” list registry.

- Provide you with information and/or services you request.
- Determine eligibility and process applications for products and services.
- Inform you regarding products and services we may offer.
- Communicate, service, and bill accounts or clients.
- Inform the research and development of new products and services.
- Analyze claims data or other data to (i) respond to your questions or provide you information that you request; (ii) provide you with products, services, or subscriptions that you select, including associated benefits; (iii) carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection; (iv) present our Website and its contents to you; (v) help dynamically generate content on web pages or in newsletters; (vi) store information about your preferences, so we can better personalize your content; and (vii) conduct other commercial purchases, including advertising and product development.
- Obtain and update insurance or credit information with appropriate third parties, such as credit reporting agencies.
- Monitor and administer accounts and the services thereto.
- Conduct employee and other training.
- Perform market analysis, analytics, decisioning, advertising and marketing of products and services to you, or to facilitate advertising and marketing.
- Fulfill contractual obligations.
- Comply with or satisfy a legal or regulatory requirement.
- Fulfill any additional commercial purposes, provided that it is within the applicable law(s).

## **5. With Whom Do We Share Your Personal Data**

Aria Benefits LL does not rent or sell the Personal Data that we collect except in accordance with this Privacy Policy. Aria Benefits LL may disclose your information, including Personal Data, as follows:

- To insurers, reinsurers, insurance intermediaries, brokers, underwriters, insurance reference bureaus, medical service providers, fraud detection agencies, our advisers, loss adjusters, lawyers, accountants, and others involved in the claims handling process (“Disclosure”). Additionally, to guaranty funds or agencies, applicable rating agencies of the financial

institution, persons assessing our compliance with industry standards, and our attorneys, accountants, and auditors.

- To Aria Benefits LL entities or service providers working on our behalf that reside in geographical borders outside the United States. This means that we may store this information in a jurisdiction other than where you are based, including outside the United States. We will take all steps reasonably necessary to ensure that your data is treated securely and subject to appropriate safeguards in accordance with this Privacy Policy and applicable legislation.
- To third parties who assist us in operating our Website, conducting our business, or servicing you, including marketing and advertising.
- As permitted by law, to third party insurance rate advisory organizations and other organizations who compile commercial databases of insurance and financial information which may include premium and loss data, vehicle history, name, address, ownership structure, liens, judgements, and payment history.
- To comply with the law, enforce our Website policies, or protect our or others' rights, property, or safety.
- If we are required to do so or have the good faith belief that such action is necessary to conform to the edicts of the law or comply with legal process or request served on Aria Benefits LL.
- When necessary or appropriate to prevent physical harm or financial loss, in connection with an investigation of suspected or actual illegal activity.
- As required for company audits or to investigate a complaint or security threat.
- Subject to applicable law and regulations, if this Aria Benefits LL Website is sold to, or merges with, another company not owned by Aria Benefits LL, you should expect that some or all of your Personal Data collected from this Website may be transferred, sold to, or assigned to the buyer/surviving company. If so, Aria Benefits LL will seek to obligate the acquiring company to use any Personal Data transferred by this Aria Benefits LL Website in a manner consistent with this Privacy Policy, but cannot guarantee that it will be able to impose that requirement or that the acquiring company will comply.
- To enforce or apply our Website policies and/or other agreements, including for billing and payment collection purposes, or to protect the rights, property, or safety of Aria Benefits LL or our customers, or others. This may include an exchange of information, including your Personal Data, to other companies and organizations for the purposes of fraud protection and credit risk reduction.



- For any other purpose you have consented to when required by applicable law and regulations.
- To our service providers which are contractually restricted from using or disclosing your information except as necessary to perform services on our behalf or to comply with legal requirements.

By providing Personal Data, including sensitive information, to Aria Benefits LL, you consent to the types of disclosures or data transfers outlined in this Privacy Policy.

## **6. The Period For Which Your Personal Data Will Be Stored By Us**

Aria Benefits LL retains your data so long as necessary to fulfill the Purposes for which it was collected, unless a shorter retention period is otherwise agreed to by contract. Aria Benefits LL may hold onto your data for a longer retention period if it is necessary to meet regulatory or legal requirements, enforce our Terms of Service, or prevent fraud or abuse, or in the ordinary course of archiving our business records.

## **7. Data Security**

Aria Benefits LL takes steps to protect your information from unauthorized access. While we take reasonable measures to protect the information you submit via the website against loss, theft, and unauthorized use, disclosure, or modification, we cannot guarantee its absolute security. No internet, email, or mobile application transmission is ever fully secure or error free. Email or other messages sent through the website may not be secure. You should use caution whenever submitting information through email or the website and take special care in deciding which information you provide us.

## **8. Revisions To Our Privacy Policy**

We reserve the right to change this Privacy Policy at any time. Any changes we make will be posted on this Website. If we make material changes to how we treat your Personal Data, we will notify you by e-mail to the e-mail address provided by you or through a notice on the Website home page. The date of this Privacy Policy was last revised is identified at the top of the page. You are responsible for periodically monitoring and reviewing any updates to this Privacy Policy. Your continued use of our Website after such amendments will be deemed your acknowledgment and consent of these changes to this Privacy Policy.

## **9. Third-Party Links**

We may include on our Website links to other websites containing third party products or services. Please note that this Privacy Policy does not apply to those websites or services. We encourage you to read the privacy statements and terms and conditions of any linked or referenced websites you enter. These third-party websites may use their own cookies and tracking devices, log your IP address, and otherwise collect data or solicit your Personal Data. Aria Benefits LL claims no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Website and welcome any feedback about these sites.

## **10. Do Not Track**

Because a “Do Not Track” (DNT) standard has not yet been adopted, we do not currently respond to DNT signals.

## **11. Your Rights With Regard To Your Personal Data**

Aria Benefits LL provides you with the opportunity to opt-out of receiving email or telephone communications from us, our business partners, and third party survey vendors. To opt-out of receiving these communications, please contact us at the email or postal address listed in this Privacy Policy below in Section 19.

## **12. Accessing and Updating Your Information**

Aria Benefits LL attempts to maintain reasonably accurate and complete records containing your Personal Data and other information. If you signed up for electronic communications from us, you can unsubscribe at any time, as we advise in the instructions included in that communication. Likewise, if you elected to receive push notifications through your mobile device, you can stop them by changing your preferences through your device or application settings. You may also uninstall our application through your mobile device’s uninstall process if you no longer wish for the mobile application to collect information or be on your device. As described in our Cookie Policy, you may modify your web browser settings to accept or refuse cookies.

You may also contact us via e-mail or the postal address listed in the Contact Us section at the bottom of this Privacy Policy. Please provide your current contact information, describe the information you want to access, and your requested changes. We will provide you access to the Personal Data requested, subject to reasonable limitations provided by law, unless it violates third party privacy or other protections. Should we be unable to provide you with the requested access, we will tell you why that is the case.

### **13. Aria Benefits LL's Cookie Policy**

This Cookie Policy is part of our Terms of Use and Privacy Policy and is incorporated herein by reference. By using Aria Benefits LL's Services, you agree that we can place cookies on your device as described herein.

Aria Benefits LL collect information about how you use our Website by using cookies. A cookie is a small text file, generated by a website, that is stored in the website user's internet browser or computer or mobile device hard drive, on a temporary or permanent basis. Cookies allow a website to identify a user's device whenever that user returns to the website. This provides the user with a more stable and enriching experience, and allows a website owner to gather usage information. You can find more detailed information about cookies and how they work at [www.aboutcookies.org/](http://www.aboutcookies.org/).

You can configure your internet browser preferences to limit the acceptance and storage of cookies, but blocking all cookies may severely limit your browsing experience on our and other websites.

Aria Benefits LL may also utilize web beacons and similar tracking technologies to gather information about your interactions with Aria Benefits LL websites. A web beacon is a one-pixel usually-transparent electronic image inserted in web content or email messages. It passes information about pages and content viewed by Aria Benefits LL Website users.

### **14. Aria Benefits LL's Cookie Use**

Cookies allow Aria Benefits LL to identify a user's device when that user returns to Aria Benefits LL's Website and to run its Services more efficiently by providing a more stable experience custom to each user.

Cookies also may provide Aria Benefits LL with information about its users and enable Aria Benefits LL to compile aggregate user statistics.

The cookies Aria Benefits LL uses vary. Some of the cookies Aria Benefits LL uses are necessary to allow users to navigate secure areas containing content for registered users. Aria Benefits LL also uses functional cookies to gather information about user choices such as language, region, or other settings. Information gleaned from these functional cookies is usually anonymized and not used for non-functional purposes.

Aria Benefits LL uses analytical services to determine the effectiveness of our content, what interests our users, and the functionality of our Services. We also

use web beacons (which are usually one- pixel electronic images inserted in web content or email messages), tracking pixels, and similar technologies to understand more about Website visitors and count visitor numbers.

Aria Benefits LL utilizes performance cookies to track how many individual users visit our Website and how often they do so. While information gathered through web beacons, tracking pixels, and performance cookies are generally not used to personally identify any user, such data may be combined with other information to analyze personal website user information.

This Website does not utilize targeting cookies, which deliver targeted advertising. However, third party websites on which Aria Benefits LL may advertise may use these cookies to track the success of those advertising campaigns. We may use web beacons to decipher which users arrived at our website after viewing an advertisement on such a third party website. Aria Benefits LL does not glean Personal Data from the use of web beacons, but rather uses this technology to gauge the effectiveness of our ads and compile aggregated data about Website users. Web beacons may also work in concert with cookies on your device to monitor activity. You cannot block web beacons, and because they are not installed on your device, you cannot remove them.

However, you can remove and block the cookies on which web beacons rely to glean information about your user activity.

## **15. Your control over cookies**

You can control and manage your cookies in various ways. You can control whether you block or accept cookies by modifying your internet browser settings, including the selection of “do not track” options. You can accept all cookies, be notified when a cookie is sent, or reject all cookies. Most browsers also allow you to individually delete cookies, though this may cause you to lose preferences you set for various websites. Note that removing or blocking cookies may impair your user experience and prevent access to portions of Aria Benefits LL’s Website. Aria Benefits LL’s web beacons will still function without cookies, but will only record that the Website was anonymously visited. For more information about how to modify your browser settings to block or filter cookies, see [www.aboutcookies.org/](http://www.aboutcookies.org/).

You can opt-out of having your anonymized browsing activity within websites recorded by analytics cookies.

A local shared object or flash cookie is similar to other cookies except that it can store additional information. These cookies cannot be filtered using the browser

settings as described above. Some parts of Aria Benefits LL's Website use flash cookies to store preferences for media player functionality. Some video content may not play properly without these cookies. These cookies can be controlled manually by visiting the Adobe website.

## **16. International Users**

Aria Benefits LL and this Website are based in the United States. Aria Benefits LL only offers insurance to United States residents. By using the Website, you consent to this collection, transfer, storage, and processing of information in the United States in accordance with the foregoing.

## **17. Aria Benefits LL Does Not Intend to Collect Information of Children**

We understand the importance of protecting the privacy of children. Our Website is not intentionally designed for or directed at children under 18 years of age, and we do not knowingly collect personal information from children on our Website. No one under the age of 13 may provide any information, personal or otherwise, to or on our Website. If we learn we have collected or received Personal Data from a child under 18 without verification of parental consent, we will delete that information immediately. If you believe we might have any information from or about a child under 18, please contact us at the postal or email address listed in this Privacy Policy.

## **18. California Privacy Rights, including under the California Consumer Privacy Act of 2018**

### **(a) Personal Data Collection; Deletion; Opting Out**

You have the right to request and obtain from us, once a year and free of charge, a list of all third parties, if any, to which Aria Benefits LL has disclosed certain Personal Data during the preceding calendar year for the third parties' direct marketing purposes.

You may request, up to two times each year, that we disclose to you the categories and specific pieces of Personal Data that we have collected about you, the categories of sources from which your Personal Data is collected, the business or commercial purpose for collecting your Personal Data, the categories of Personal Data that we disclosed for a business purpose, any categories of Personal Data about you that we sold, the categories of third-parties with whom we have shared your Personal Data, and the business or commercial purpose for selling your Personal Data, if applicable.

In general, the Personal Data that we collect includes the following categories of data from the following sources, for the stated business purposes, and the categories of third parties with whom we may share such Personal Data:

Subject to certain conditions, you may request deletion of your Personal Data collected or maintained by us (e.g., where you think that the information is inaccurate or unlawful). Please note that there are various lawful reasons why we may not be in a position to erase your Personal Data — for instance, (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, or (iii) where retention periods apply by law or policies.

For clarity, we will not sell your Personal Data to third parties for their direct marketing purposes unless you give us specific permission.

For requests under this Section 18, please send a request to [privacy@AriaBenefitsLLinsurance.com](mailto:privacy@AriaBenefitsLLinsurance.com) with the subject heading “California Privacy Rights,” or contact us using the information in Section 19 below. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California Privacy Rights requirements and only information on covered sharing will be included in our response. Further, to protect the privacy of your information and account, we are required to verify all requests.