

# Consumer-Savings.com

## Privacy Policy

*Last Updated: Dec 17th, 2023*

PLAN A, LLC, a Florida limited liability company ("PLAN A", "consumer-savings.com", "we" or "our"), is the owner and operator of this website consumer-savings.com. consumer-savings.com respects the privacy of our consumer users ("you" or "your") and has developed this Privacy Policy to demonstrate its commitment to protecting your privacy. If you are an individual who is a user of this website, who accesses or responds to advertisements or offers e-mailed or displayed to you relating to this website or auto insurance, or who is otherwise as a user of the services provided by consumer-savings.com, this Privacy Policy is intended to describe for you, among other things:

- The information we collect about you
- How we use the information we collect
- With whom we share your information
- How you can access your information
- Your choices about collection and use of your information

How we protect your personal information

We encourage you to read this Privacy Policy carefully when using our website or services, responding to our advertisements and offers, or transacting business with us. By using our website, you are accepting the practices described in this Privacy Policy. (This Privacy Policy does not apply to our vendors, contractors and employees.)

If you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information on how to contact us.

### **THE INFORMATION WE COLLECT ABOUT YOU**

**In General.** We may collect personal information that can identify you such as your name and e-mail address, as well as other information that does not identify you such as your zip code. When you provide personal information through our website, the information may be sent to consumer-savings.com servers located in the United States and other countries around the world.

**Information You Provide.** As mentioned above, we may collect information you submit on our website, such as your name, e-mail address and zip code. We may also track your interaction with email advertisements sent to you by consumer-savings.com or our e-mail service providers on our behalf (for example, when you register, purchase, or browse in response to such emails). Interactions with our

website, including page clicks, time spent, and other meta-data may also be collected. In addition, we may also collect data from internet cookies.

**Information from Other Sources.** We may also periodically obtain both personal and non-personal information about you from business partners, contractors and other third parties, as well as information from public databases. Examples of information that we may receive include information about your home and additional demographic information.

### **Use of Cookies and Other Technologies to Automatically Collect**

**Information.** We and our authorized service providers, advertising companies, and ad networks may use various activity tracking technologies, such as cookies, pixels and web beacons, to collect information from your computer and about your activities on our website or interaction with our advertisements (see "Information Collected by Third Parties" below). We and these companies may automatically collect information from your browser when you visit our website. This information may include your IP address, your browser type and language, access times, the content of any undeleted cookies that your browser previously accepted from us or them (see "Cookies" below) and the referring website address.

**Cookies.** When you visit our website, we may assign your computer one or more cookies, to facilitate access to our website, to personalize your online experience, and to record information about your visit to our website. A cookie is a small amount of data stored on the hard drive of your computer that allows your computer's browser to store your preferences and allows consumer-savings.com, our authorized service providers, advertising companies and ad networks to identify you by a unique identifier and associate this with corresponding information in our or their database. Through the use of a cookie, we and these companies may store your non-personally identifiable registration information and user preferences and may also automatically collect information about your online activity on websites, such as the web pages you visit, the links or advertisements you click, or the other actions you conduct while on websites. In addition, consumer-savings.com may set a cookie on your computer when you view our advertisements delivered on or in connection with a third-party website you are visiting. After a cookie is set, consumer-savings.com may track how you interact with the advertisement (for example, registering, purchasing, browsing, etc.). Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies, please note that you may not be able to use some of the interactive features offered on our website. We do not tie tracking cookies used for behavioral or targeted advertising purposes to any personal information you submit while on our website; however, cookies may be tied to your personal information for purposes of matching you with insurance companies and managing our relationships with these companies and other websites from which you may have been referred to us. They do NOT, however, collect personal information. Although we may place or allow third parties to place their cookies when you visit our website (as described more fully in the subsection below entitled "Targeted or Behavioral Advertising"), we do not have access or control over third party cookies, nor does our Privacy Policy cover the use of cookies by third parties.

**Other Technologies.** We may use other standard Internet activity tracking technologies, such as web beacons and similar technologies, to track your use on our website or your interaction with our advertisements. A web beacon is a programming code used to display an image on a web page and can also transfer an individual's user identification to a database and associate the individual with previously acquired information about the individual. Such information may be used in targeted or behavioral advertising, as well as for the other uses described in this paragraph. We may include web beacons in promotional e-mail messages or newsletters or online advertisements to determine whether messages have been opened or acted upon. We may use the information we obtain in this manner to customize the services and offers we provide our website's visitors, to deliver targeted advertisements, and to measure the overall effectiveness of our online advertising, content, programming or other activities. We do not tie web beacons to any personal information you submit while on our website.

## **INFORMATION COLLECTED BY THIRD PARTIES.**

### **Targeted or Behavioral Advertising**

Targeted advertising (also known as behavioral advertising) uses information collected on an individual's web browsing behavior such as the pages they have visited or the searches they have made. This information is then used to select which PLAN A advertisement should be displayed to a particular individual on websites other than an PLAN A site. For example, if you have shown a preference for Medicare supplemental insurance while visiting an PLAN A, site, you may be served an advertisement from or about the PLAN A site for Medicare supplemental insurance when you visit a site other than the PLAN A site. The information collected is only linked to an anonymous cookie ID (alphanumeric number); it does not include any information that could be linked back to a particular person, such as their name, address or credit card number. The information used for targeted advertising either comes from the PLAN A site you are visiting or through third party website publishers.

In addition, we may place (or allow third parties to place) cookies and pixels on our website which enable our authorized service providers, advertising companies and advertising networks to collect information about our users who view or interact with their or our advertisements on our website or complete certain actions on our site, such as submitting a form. However, we do not tie these cookies and pixels to personal information that you submit on our website. The information collected by the cookies and pixels allows us and our partner companies to deliver, and gauge the effectiveness of, targeted advertisements, both on our website and when you are browsing other websites. Some of these third-party advertising companies may be advertising networks that are members of the Network Advertising Initiative ([www.networkadvertising.org](http://www.networkadvertising.org)), which offers a single location to opt out of ad targeting from member companies.

### **Storage of Information We Collect**

We may store the personal information described above as necessary to accomplish the business purposes for which it was collected, as well as to comply with our legal

and audit obligations, resolve reported and potential disputes, and enforce our agreements. We also maintain an information security program that limits storage of personal information to what is needed to fulfill our reasonable business, legal and audit requirements.

## **HOW WE USE THE INFORMATION WE COLLECT**

In general. We may use information that we collect about you to:

- deliver the products and services that you have requested (for example, to provide you with Medicare supplemental insurance quotes and/or match you with insurance companies);
- send you offers that you have opted in to receive;
- manage your relationship with us and provide you with customer support;
- perform research and analysis about your use of, or interest in, our products, services or content, or products, services or content offered by others;
- communicate with you by e-mail, postal mail, telephone and/or mobile devices about products or services that may be of interest to you either from us or third parties;
- develop and display content and advertising (such as targeted ads) tailored to your interests on our websites and other websites;
- enforce our terms and conditions;
- protect consumer-savings.com, our websites, our customers and/or our other users from fraud, hacking or other harm;
- cooperate with legal, criminal or regulatory investigations or proceedings;
- manage our business; and
- perform functions as otherwise described to you at the time of information collection.

## **WITH WHOM WE SHARE YOUR INFORMATION**

We do not share, sell, rent or trade your personal information with third parties other than as disclosed within this Privacy Policy.

We want you to understand when and with whom we may share personal or other information we have collected about you or your activities on our website, while using our services or in your other interactions (such as responding to e-mails) with us.

We may share your personal information with the following third parties:

**Authorized Service Providers.** We may share your personal information with our authorized service providers that perform certain services on our behalf. For example, we may engage other companies to provide data storage, to assist in marketing consumer-savings.com products or services, to conduct audits, to provide web analytics, and to provide hosting, design, development and other operations which make our website work. Other third-party service providers may help us communicate with you through e-mail. Our policy is to permit these third-party service providers to obtain only the personal information they need to provide the

services, and to require them to protect personal information to the same extent as consumer-savings.com, including not using it for any improper purpose.

**Business Partners.** When you express interest in products, services or promotions offered through our website or our services, we may share your expression of interest with the businesses with which we partner to offer you those products, services and promotions, and, as applicable, their affiliates and third-party finder or marketing companies. When you elect to engage in a particular offer or program, you authorize us to provide your e-mail address, phone number, and other information to those businesses.

**Marketers.** From time to time, where permitted by applicable law, we may share your personal information and automatically collected or aggregated information about you with reputable direct marketers so that they may offer products and services, which we hope, will be of interest to you. Please see the section below entitled "Your Choices About Collection and Use of Your Information" for detailed information on your choices regarding your personal information.

**Insurance Companies.** If you provide your zip code, we will find insurance companies in your area whom we think may be of interest to you. Once you submit your zip code and select the company you wish to obtain a quote from, you will then be redirected to that third party site and provide information to them directly. Because the insurance companies and other partners on the consumer-savings.com network with whom you are matched may retain or use your personal information whether or not you qualify for, or obtain, insurance or another product from them, you should contact these persons directly concerning their privacy and information sharing practices.

**Affiliates.** We may share information we collect, including personal information, with other companies affiliated with consumer-savings.com (some of which are nonfinancial companies). Sharing information with such companies enables us to provide you with information about a variety of products and services that might interest you. These companies will comply with this Privacy Policy and applicable privacy and security laws and, at a minimum, in any commercial e-mail they send to you, will give you the opportunity to choose not to receive such e-mail messages from that company in the future by providing an unsubscribe link in each communication.

**Special Notice to Vermont Residents.** consumer-savings.com will not share any personal information about you with other affiliated companies to the extent prohibited by applicable Vermont law or to the extent your prior consent to share is required by applicable Vermont law.

Other Situations. We also may disclose your information:

(1) In response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law.

(2) When we believe disclosure is appropriate in connection with efforts to investigate, or to prevent or take other action regarding, illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees or others; or to enforce our website's terms and conditions or other agreements or policies.

(3) In the event consumer-savings.com goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, or in the unlikely event of a bankruptcy, your personally identifiable information will likely be among the assets transferred. You will be notified via email or prominent notice on our website for 30 days of any such change in ownership or control of your personal information.

Please note that information may also be collected by third parties such as advertising companies and advertising networks via third-party cookies and pixels on our site (please see the subsection above entitled "Targeted or Behavioral Advertising" for details).

Any third parties to whom we may disclose or who may collect personal information may have their own privacy policies that describe how they use and disclose personal information. Except for companies affiliated with consumer-savings.com and authorized service providers, who agree to comply with this Privacy Policy with respect to personal information we share with them, the third parties' privacy policies will govern use, handling and disclosure of your personal information once we have shared it with those third parties as described in this Privacy Policy. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties. These entities or their servers may be located either inside or outside the United States.

**Aggregated and Non-Personal Information.** We may share aggregated information (i.e., information about you and other customers collectively, but not specifically identifiable to you) and other non-personal information we collect under any of the above circumstances. We may also share it with third parties and affiliated companies to develop and deliver targeted advertising on our websites and on websites of third parties. We may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. For example, we may tell our advertisers the number of visitors to our website and the most popular features or services accessed. This information does not contain any personal information and may be used to develop website content and services that we hope you and other users will find of interest and to target content and advertising.

**Third-Party Websites.** There are a number of places on our websites where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, if you click on an advertisement, an insurance quote or a search result on our websites, you may be taken to a website that we do not control. These third-party websites may independently solicit and collect information, including personal information, from you and, in some instances, provide us with information about your activities on those websites. We recommend that you consult

the privacy statements of all third-party websites you visit by clicking on the "privacy" link typically located at the bottom of the webpage you are visiting.

## **HOW YOU CAN ACCESS YOUR INFORMATION**

If your personal information changes, or if you would no longer like us to contact you, you may correct, update, or request deletion by emailing us at [compliance@consumer-savings.com](mailto:compliance@consumer-savings.com).

We will retain your information for as long as needed to provide you services. We may also retain and use your information as necessary to comply with our legal and audit obligations, resolve reported and potential disputes, and enforce our agreements. If you wish to request that we no longer use your information to provide you services, please contact us at [compliance@consumer-savings.com](mailto:compliance@consumer-savings.com). We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing all such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backups), or for which access is not otherwise required. All requests are also subject to the next section below ("Your Choices About Collection and Use of Your Information").

We also maintain an information security program that limits storage of personal information to what is needed to fulfill our reasonable business, legal and audit requirements.

## **YOUR CHOICES ABOUT COLLECTION AND USE OF YOUR INFORMATION**

You can choose not to provide us with certain information, but that may result in you being unable to use certain features of our website because such information may be required in order for you to apply for or obtain products or services.

If you would like to delete the personal information that we have collected from you, please send your request via e-mail to [compliance@consumer-savings.com](mailto:compliance@consumer-savings.com). We will process your request, where possible and subject to the terms and conditions contained in this Privacy Policy, within a reasonable period of time after receipt. However, federal and state regulations and/or the need to administer our relationships with our ad networks and other third parties may require that we store certain information for various periods of time. In order to comply with these requirements, we may be unable to delete your information from our database until the expiration of the applicable period. However, we will use reasonable commercial efforts to delete your personal information no later than three (3) months after receiving your request, unless a longer retention period is required by law. Please also be aware that if you request us to delete your personal information, your request will apply only to information held by us and not to information we have already shared with third parties; the treatment of such information held by third parties is governed by those parties' privacy policies, not by this Privacy Policy.

If you receive e-mail messages or newsletters from us, you will be given the opportunity, in any commercial e-mail that we send to you, to opt out of receiving such messages in the future. It may take up to 10 business days for us to fully process an opt-out request. We may send you other types of transactional and relationship e-mail communications, such as requests for additional information, confirmations, service updates or announcements, administrative notices and surveys, without offering you the opportunity to opt out of receiving them. Please note that opting out of receipt of commercial e-mail communications will only affect future activities or communications from us. If we have already provided your information to a third party before you have changed your preferences or updated your information, you may have to change your preferences directly with that third party.

## **HOW WE PROTECT YOUR PERSONAL INFORMATION**

We take appropriate security measures (including physical, electronic, and procedural measures) to help safeguard your personal information from unauthorized access and disclosure. For example, with regard to consumer-savings.com's internal operations, only authorized employees and authorized third party service providers are permitted to access personal information, and they may do so only for permitted business functions. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

### **California Residents.**

The California Consumer Privacy Act (CCPA) provides California residents with the additional rights listed below.

**Right to Know.** You have the right to know and see what data we have collected about you over the past 12 months, including:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information is collected;
- The business or commercial purpose for collecting your personal information;
- The categories of third parties with whom we have shared your personal information; and
- The specific pieces of personal information we have collected about you.

**Right to Delete.** You have the right to request that we delete the personal information we have collected from you. There are a number of exceptions, however, that include, but are not limited to, when the information is necessary for us or a third party to do any of the following:

- Complete your transaction;
- Provide you a good or service;
- Perform a contract between us and you;
- Protect your security and prosecute those responsible for breaching it;



- Fix our system in the case of a bug;
- Protect the free speech rights of you or other users;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interests that adheres to all other applicable ethics and privacy laws;
- Comply with a legal obligation; or
- Make other internal and lawful uses of the information that are compatible with the context in which you provided it.

**Do Not Sell My Personal Information.** You have the right to request that we do not sell your personal information. Please note that we do not knowingly sell the personal information of minors under 16 years of age without legally-required affirmative authorization.

**Authorized Agent.** You have the right to appoint another person or entity registered with the Secretary of State ("Authorized Agent") to make a request for you. If you appoint an Authorized Agent you must provide us with legal authorization indicating your consent to have an Authorized Agent act on your behalf. Examples of acceptable forms of legal authorization include, but are not limited to, a fully executed Power of Attorney or a notarized affidavit.

**Other Rights.** You can request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. You also have the right not to be discriminated against for exercising any of the rights listed above.

**Exercising Your California Privacy Rights.** To request access to or deletion of your personal information, or to exercise any other data rights under California law, please contact us or direct your authorized agent to contact us using the following methods:

- **Email:** You may write to us to exercise rights. Please include your full name, residential address, e-mail address, and phone number, along with why you are writing, so that we can verify and process your request in an efficient manner. Please email us at [compliance@consumer-savings.com](mailto:compliance@consumer-savings.com).
- **Webform:** You may fill out a [Webform](#) to exercise rights. Please include your full name, e-mail address, and phone number, along with why you are writing, so that we can verify and process your request in an efficient manner.
- **Toll-Free Telephone Number:** You may call us at 1-877-362-0705 to exercise rights. Please specify your full name, residential address, e-mail address, and phone number, along with why you are calling, so that we can verify and process your request in an efficient manner.

**How We Verify Your Request.** When submitting a request via one of the approved methods you will be prompted to provide some information, including your full name, address, email address and phone number. This information is used to validate your request. Upon collection of your information, you will receive an email asking you to

validate ownership of that email address by means of a one-time link or code. Without confirmation of ownership of your email address your request may not be processed. The link in the verification email is set to expire after a few days to protect your information should someone gain unauthorized access to your email account at a later stage. To protect your data from unauthorized access, we use the other data points you provide and match it with the information we may have previously obtained from you. If there is a mismatch in the data provided, we shall inform you of this and deny your request, at which point you may start a new claim with corrected information. If the information matches, we will proceed with the processing of your request. The level of data verification may vary depending on the type of request as allowed by the law.

**Response Timing.** After submitting your request for access or deletion, you will receive a confirmation receipt within 10 business days that includes additional information. We aim to respond to a consumer request for access or deletion within 45 days of receiving that request. If we require more time, we will inform you of the reason and extension period in writing.

**NOTE:** We may revise this privacy notice from time to time as implementing regulations further develop and come into effect.

### Categories of personal information we collect

We may collect the following categories of personal information from you or from third parties that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with a particular consumer (i.e., you) or household ("personal information"). Specifically, we may have collected the following categories of personal information within the last twelve (12) months since this policy was last updated:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a persons preferences for insurance.	YES

Please note personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## Sharing personal information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we may have disclosed the following categories of personal information for a business purpose:

Category	Description
Category A:	Identifiers.
Category B:	California Customer Records personal information categories.
Category C:	Protected classification characteristics under California or federal law.
Category D:	Commercial Information.
Category F:	Internet or other similar network activity.
Category K:	Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

## CHILDREN'S PRIVACY

Our website is for adults, and we do not knowingly collect personal information from children under the age of 18.

## VISITING OUR WEBSITES FROM OUTSIDE THE UNITED STATES

This Privacy Policy is intended to cover collection of information on our website from residents of the United States. If you are visiting our website from outside the United States, please be aware that your information may be transferred to, stored and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. Please be assured that we seek to take reasonable steps to ensure that your privacy is protected. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy. By using our website and the services available on the site, which are provided exclusively from the United States, you hereby consent to the transfer of your information to the United States and its collection, storage, sharing and use as described in this Privacy Policy. You further agree that all transactions relating to the site and our services shall be deemed to have occurred in the United States.

## GENERAL DATA PROTECTION REGULATION

For residents of the European Union, PLAN A, LLC makes all efforts to comply with the General Data Protection Regulation, which took effect on May 25, 2018. EU residents have certain rights under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to be informed about the processing of your personal information
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- The right to object to processing of your personal information
- The right to restrict processing of your personal information
- The right to have your personal information erased (the "right to be forgotten")
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information ("data portability")
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

### Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the How to Contact Us section located below.

### Legal basis for processing your personal information

PLAN A, LLC relies on the following legal bases to use your personal data:

1. **Where it is needed to provide you with our products or services**, such as:
  - a) Assessing an application for a product or service you hold with us, including consider whether or not to offer you the product, the price, the payment methods available and the conditions to attach
  - b) Managing products and services you hold with us, or an application for one
  - c) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
  - d) Sharing your personal information with business partners and services providers when you apply for a product to help manage your product

e) All stages and activities relevant to managing the product or service including inquiry, application, administration and management of accounts

f) For some of our profiling and other automated decision making to decide whether to offer you a product and/or service, particular payment method and the price or terms of this

2. Where **it is in our legitimate interests to do so**, such as:

a) Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)

b) To perform and/or test the performance of, our products, services and internal processes

c) To follow guidance and recommended best practice of government and regulatory bodies

d) For management and audit of our business operations including accounting

e) To carry out monitoring and to keep records of our communications with you and our staff (see below)

f) To administer our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for AGM processes

g) For market research and analysis and developing statistics

h) For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service

i) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses

j) For some of our profiling and other automated decision making

k) Where we need to share your personal information with people or organizations in order to run our business or comply with any legal and/or regulatory obligations

3. To comply with our **legal obligations**

4. With your **consent or explicit consent**:

- a) For some direct marketing communications
- b) For some of our profiling and other automated decision making
- c) For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer or some criminal records information

## **NO RIGHTS OF THIRD PARTIES**

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of our website.

## **CHANGES TO THIS PRIVACY POLICY**

We will occasionally update this Privacy Policy to reflect changes in our practices and services. When we post changes to this Privacy Policy, we will revise the "last updated" date at the top of this Privacy Policy. Accordingly, you should periodically check the "last updated" date at the top of our Privacy Policy so that you can familiarize yourself with any changes.

## **HOW TO CONTACT US**

If you have any questions about this Privacy Policy or our information-handling practices, or if you would like to request information about our disclosure of personal information to third parties for their direct marketing purposes, please contact us at [compliance@consumer-savings.com](mailto:compliance@consumer-savings.com).