PRIVACY POLICY

Flanders Insurance Agency ("we", "us" "our" and "Flanders") respects the privacy of its users. As a result, we have developed this Privacy Policy to describe to you our use of your Personal Information. The terms "you" or "your" means a user of the Flanders websites located at <u>www.FlandersInsurance.com</u> (the "Websites"). The term "Personal Information" means information that you provide to us which personally identifies you, such as your name, phone number, email address, social security number, and any other data that is tied to such information. This Privacy Policy applies to your use of the Websites, but not does apply to any third-party sites that may be linked to them, or any businesses listed on the Websites.

Your use of the Websites means that you agree to be bound by the terms of this Privacy Policy, which has been incorporated into our Terms of Service, which are located at <u>www.FlandersInsurance.com</u>. By using the Websites, you expressly consent to our using your Personal Information according to this Privacy Policy. If you do not agree with these terms, please do not use the Websites.

Childrens Online Privacy Protection Act Compliance

We are in compliance with the requirements of COPPA (Childrens Online Privacy Protection Act); we do not collect any information from anyone under 13 years of age. The Websites, products and services are all directed to people who are at least 13 years old or older. If we obtain actual knowledge that a user is under the age of 13, we will remove that user's information from our databases. If you are between the ages of 13 and 18, you must obtain your parent's permission before transmitting information to us over the internet. By using the Websites, you are warranting and representing to us that you are over the age of 18, and if you are between the ages of 13 and 18, you have your parent's permission to use the Websites.

Information We Collect and How We Use It

We use commercially reasonable efforts to ensure that the collection of Personal Information is limited to that which is necessary to fulfill the purposes identified below. If we use your information in a manner different than the purpose for which it is collected, we will ask you for your consent prior to such use.

Account information and Information About You. If you create an account to take advantage of the services offered on the Website, we ask for and record Personal Information such as your name, address, social security number, credit card number, and banking information. This information will be used to provide our services to you, and may include: the underwriting and rating of your polices and accounts, processing your claims, ensuring proper billing, servicing your policies and accounts, enhancing your experience as our customer, and to offer you other insurance or financial services.

Feedback. If you contact us to provide feedback or ask a question, we will record any Personal Information and other content that you provide in your communication so that we can effectively respond to your communication.

Log Files. Any time you visit any of the Websites, our servers automatically gather information from your browser (such as your IP addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks) to analyze trends, administer the site, prevent fraud, track visitor movement in the aggregate, and gather broad demographic information. For example, we may log your IP address for system administration purposes. IP addresses are logged to track a user's session. This gives us an idea of which parts of our site users are visiting. We do not share the log files externally.

Cookies. We send cookies to your computer in order to uniquely identify your browser and improve the quality of our service. The term "**cookies**" refers to small pieces of information that a website sends to your computer's hard drive while you are viewing the site. We may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your computer until you delete them). Persistent cookies can be removed by following your browser help file directions. If you choose to disable cookies, some areas of the Websites may not work properly or at all.

Purchase Information. To process payments, we may require your name, address, phone number, email address, and credit card information. Such information is used primarily to process your order or as otherwise described herein. Credit card transactions are processed through industry standard Secure Socket Layer (SSL) and/or strong encryption (3DES) by a third-party, which only uses your information for that purpose. After a transaction, your private information (credit cards, social security numbers, financials, etc.) will not be stored on our servers.

E-mails. We require an e-mail address from you when you register for our services. We use your e-mail for both t**ransactional** (e.g., order confirmation) and **promotional** (e.g., newsletters, new product offerings, special discounts, event notifications, special third-party offers) purposes. E-mail messages we send you may contain code that enables our database to track your usage of the e-mails, including whether the e-mail was opened and what links (if any) were clicked. If you would rather not receive promotional e-mails from us, please see the section below labeled "Emails and Opt-Out". We reserve the right to send you certain communications relating to our services, such as service announcements and administrative messages, and transactional messages about any orders that you place, without offering you the opportunity to opt-out of receiving them.

Enforcement. We may use the information we collect in connection with your use of the Websites (including your Personal Information) in order to investigate, enforce, and apply our Terms of Service and Privacy Policy.

Transfer of Information

We may share your Personal Information with third-parties to provide you with services that we offer, like insurance policies or financial services, conduct quality assurance testing, facilitate creation of accounts, provide technical and customer support, or provide specific services, such as synchronization of your contacts with other software applications, in accordance with your

instructions. These third-parties are required not to use your Personal Information other than to provide the services requested by you.

We may share your Personal Information with our parent company, subsidiaries, joint ventures, or other companies under a common control (collectively, "**Affiliates**") that we may have now or in the future, in which case we will require them to honor this Privacy Policy. If another company acquires our company or our assets, that company will possess your Personal Information, and will assume the rights and obligations with respect to that information as described in this Privacy Policy.

We may disclose your Personal Information to third-parties in a good faith belief that such disclosure is reasonably necessary to (a) take action regarding suspected illegal activities; (b) enforce or apply our Terms of Service and Privacy Policy; (c) comply with legal process, such as a search warrant, subpoena, statute, or court order; or (d) protect our rights, reputation, and property, or that of our users, affiliates, or the public. Please note that we are not required to question or contest the validity of any search warrant, subpoena or other similar governmental request that we receive. We will, however, notify you in the event we receive a subpoena or other governmental request so that you may, at your expense, take such action you deem appropriate.

We may disclose information in the aggregate to third-parties relating to user behavior in connection with actual or prospective business relationships with those third-parties, such as advertisers and content distributors, but no individual information will be disclosed along with such aggregated information. For example, we may disclose the number of users that have been exposed to, or clicked on, advertising banners.

We may use third-party advertising companies to serve ads when you visit the Websites. These companies may use information (not including your name, address, email address, or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. These companies may employ cookies and web beacons to measure advertising effectiveness.

Notwithstanding any other provision of this Privacy Policy or our Terms of Service, we reserve the right, but have no obligation, to disclose any information that you submit to the services, if in our sole opinion, we suspect or have reason to suspect, that the information involves a party who may be the victim of abuse in any form. Abuse may include, without limitation, elder abuse, child abuse, spousal abuse, neglect, or domestic violence. Information may be disclosed to authorities that we, in our sole discretion, deem appropriate to handle such disclosure. Appropriate authorities may include, without limitation, law enforcement agencies, child protection agencies, or court officials. You hereby acknowledge and agree that we are permitted to make such disclosure.

Links

The Websites may contain advertisements or other content that link to third-party websites to which we have no affiliation. Except as set forth herein, we do not share your Personal

Information with those third-parties, and are not responsible for their privacy practices. We suggest you read the privacy policies on all such third-party websites before providing any information on such websites.

Google Adsense

Some of the advertisements on the Flanders Websites may be served by Google. Google's use of the DART cookie enables it to serve ads to users based on their visit to our Website and other sites on the Internet. DART uses "non personally identifiable information" and does NOT track Personal Information about you, such as your name, email address, physical address, etc. You may opt out of the use of the DART cookie by visiting the Google ad and content network Privacy Policy at <u>http://www.google.com/privacy_ads.html</u>

Security

Your account is password protected, by a password of your choosing. We use industry standard measures to protect the Personal Information that is stored in our database. We limit the access to your Personal Information to those employees and contractors who need access to perform their job function, such as our customer service personnel. If you have any questions about the security on the Websites, please contact us. Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that your Personal Information will never be disclosed in a manner that is inconsistent with this Privacy Policy.

You hereby acknowledge that Flanders is not responsible for any intercepted information sent via the internet, and you hereby release us from any and all claims, damages, costs, liabilities and expenses (including actual attorney's fees) arising out of or related to the use of intercepted information in any unauthorized manner.

Emails and Opt-out

You may opt-out of receiving promotional notifications from us via email by contacting us at ______). We will take commercially reasonable efforts to remove your from our solicitation list. Unregistered users who receive e-mails from us may also opt-out of receiving further e-mails by following the instructions contained in our e-mails, or by contacting us at (815) 226-1444 to be removed from solicitations.

Despite your indicated e-mail preferences, we may send you notices of any updates to our Terms and Conditions of Service or Privacy Policy, or emails that relate to any transactions or purchases you make on the Websites. If you do not permit us to contact you via email for these purposes, then you are not permitted to use the services of Flanders.

Terms and Modifications to this Privacy Policy

We may modify this Privacy Policy at any time, and we will post any new versions on this page. If we make any material changes in the way we use your Personal Information, we will notify you by sending an e-mail to the last e-mail address you provided to us and/or by prominently

posting notice of the changes on the Websites. Any such changes will be effective upon posting on our site, or upon email to you, whichever is first. Please note that at all times you are responsible for updating your Personal Information to provide us with your most current e-mail address. In the event that the last e-mail you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. In any event, changes to this Privacy Policy may affect our use of Personal Information that you provided us prior to our notification to you of the changes. If you do not wish to permit changes in our use of your Personal Information, you must notify us prior to the effective date of the changes that you wish to deactivate your account with us. Continued use of the Websites following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

Dispute Resolution

If you believe that Flanders has not adhered to this Privacy Policy you may write to the Flanders at the following address:

Flanders Insurance Inc. 1947 Lyford Road Rockford, Illinois 61107

Or you may send us an email at <u>flanders@flandersinsurance.com</u>

In your letter or email, please describe in as much detail as possible ways in which you believe the Privacy Policy has not been complied with. We will investigate your complaint promptly.

Contacting the Website and Access to Your Personal Information

Upon written request, subject to certain exceptions, Flanders will inform you of the existence, use, and disclosure of your Personal Information and will give you access to that information. Access requests should be sent to us using the contact information above. When requesting access to your Personal Information, we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide the Personal Information that we hold about you. We may charge you a fee to access your Personal Information to cover our costs; however, we will advise you of any fee in advance, which will be no more than any maximum fee prescribed by law.

If you have any questions about this Privacy Policy, the privacy practices of the Websites or if you want to exercise any of the rights that you are given under this Privacy Policy, you can contact us using the contact information listed above.

Acceptance of Privacy Policy

Your use of the Websites, including any dispute concerning privacy, is subject to this Privacy Policy and the applicable Terms of Service. **BY USING THE WEBSITES, YOU ARE**

ACCEPTING THE PRACTICES SET OUT IN THIS PRIVACY POLICY AND THE APPLICABLE TERMS OF SERVICE.

If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy page and any other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, or by other means, such as e-mail, at our discretion.

Your continued use of any portion of the Websites following posting of the updated Privacy Policy will constitute your acceptance of the changes.

Effective Date

This Privacy Policy was last revised on July 15, 2015.